

## INDEPENDENT ENVIRONMENTAL AUDIT (2019/20)

Southern Highland Regional Shooting Complex

430 Wattle Ridge Road  
Wattle Ridge, New South Wales

March 2021

## Details

### Report

<b>Precise Environmental Pty Ltd</b>		<b>Job No</b>	PE3000.20
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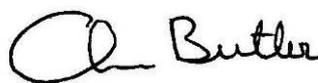
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<b>Independent Audit Certification Form</b>	
Development Name	Southern Highlands Regional Shooting Complex
Development Consent No.	Consolidated Approval - MP06_0232 MOD 1 To MOD5
Description of Development	Shooting complex
Development Address	Wattle Ridge Road, Wattle Ridge NSW
Operator	Southern Highlands Regional Shooting Complex Inc.
Operator Address	Wattle Ridge Road, Wattle Ridge NSW
<b>Independent Audit</b>	
Title of Audit	Independent Environmental Audit (2019/20)
<p><i>I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge:</i></p> <ul style="list-style-type: none"> <li>• <i>The audit has been undertaken in accordance with relevant approval condition(s) and in accordance with the auditing standard AS/NZS ISO 19011:2014 and Post Approval Guidelines – Independent Audits</i></li> <li>• <i>The findings of the audit are reported truthfully, accurately and completely;</i></li> <li>• <i>I have exercised due diligence and professional judgement in conducting the audit;</i></li> <li>• <i>I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;</i></li> <li>• <i>I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;</i></li> <li>• <i>I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family);</i></li> <li>• <i>Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and</i></li> <li>• <i>I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.</i></li> </ul> <p><i>Note.</i></p> <p><i>a) The Independent Audit is an 'environmental audit' for the purposes of section 122B(2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.</i></p> <p><i>b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or \$22,000, or both).</i></p>	
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## Table of Contents

<b>1</b>	<b>INTRODUCTION.....</b>	<b>1</b>
1.1	OVERVIEW .....	1
1.2	AUDIT OBJECTIVES .....	1
1.3	AUDIT SCOPE.....	2
1.4	AUDIT CRITERIA .....	3
1.5	LIMITATIONS.....	3
<b>2</b>	<b>METHODOLOGY .....</b>	<b>5</b>
2.1	AUDIT PROCESS.....	5
2.2	SITE INSPECTION SCOPE .....	6
2.3	AGENCY CONSULTATION .....	6
2.4	COMPLIANCE ASSESSMENT CRITERIA .....	6
<b>3</b>	<b>AUDIT FINDINGS .....</b>	<b>8</b>
3.1	AGENCY AND COMMUNITY CONSULTATION .....	8
3.2	AUDIT CHECKLIST.....	8
3.3	COMPLIANCE SUMMARY .....	8
3.3.1	<i>Conditions of approval and associated management plans.....</i>	<i>8</i>
3.3.2	<i>Commitments and key features .....</i>	<i>9</i>
3.3.3	<i>Incidents and corrective actions.....</i>	<i>9</i>
3.3.4	<i>Adequacy and review of management plan.....</i>	<i>9</i>
3.3.5	<i>Improvement opportunities.....</i>	<i>10</i>
3.4	REVIEW OF HOURS OF OPERATION .....	10

### FIGURES

Figure 1: General site layout

Figure 2: Extents of complex

### TABLES

Table 1.	Management plans audited.....	3
Table 2.	Audit team.....	5
Table 3.	Audit participants - SHRSC and OoS.....	5
Table 4.	Compliance assessment criteria.....	6
Table 5.	Risk levels for non-compliance.....	7
Table 6.	Compliance assessment summary.....	8

### APPENDICES

Appendix A: Figures

Appendix B: Compliance & risk assessment

Appendix C: Appointment of Audit Team

Appendix D: Site inspection photographs

Appendix E: Agency consultation correspondence

# 1 INTRODUCTION

## 1.1 Overview

Precise Environmental (PE) was commissioned by NSW Office of Sport (OoS) to conduct an independent environmental audit of the Southern Highland Regional Shooting Complex (SHRSC) located at Wattle Ridge Road Lot 100 DP 1088254, Wattle Ridge, NSW. The original facility comprised an 800 m shooting range which commenced operation in 1987. Construction and operation of two additional ranges (50 m and 500 m) and ancillary facilities was first approved by the Department of Planning and Environment in 2010, with subject modifications to the approval culminating in the current MOD 5 consolidated approval (dated 31 July 2017). Construction of the new ranges and facility improvements was completed in early 2019 with operations commencing April 2019.

Key features of the Complex include the following as depicted in Appendix A, Figure 1:

- General range facilities - covered firing point, range control rooms, toilet facilities, carpark
- Range surfaces - graded in a concave manner with elevated firing points to maintain a common line of fire; vegetated with a mix of local native grass regrowth
- Stopbutts with subsoil drains in front draining seepage through a lime treatment train at each ranges
- Stormwater basins and drainage swales
- Water supply (rainwater) and onsite wastewater treatment systems
- Maintenance and storage sheds and containers
- Access tracks (unsealed).

Located between Nattai National Park and Bargo State Conservation Area, approximately 6 kilometres northwest of the Hill Top, the Complex is surrounded by dense native bushland of high conservation value (Appendix A, Figure2). Accordingly, the development is subject to a range of consent conditions (Consolidated Approval - MP06\_0232 MOD 1 To MOD5) and Conservation Agreement (October 2010) which stipulate requirements for maintaining the conservation values of the surrounding area and mitigation of adverse environmental impacts more broadly. These requirements have been addressed in the formulation of the approved environmental and operational management plans for the Complex.

Under Condition A11 of the Modified approval (MOD 5, dated 31 July 2017), the activity is required to undertake independent auditing and reporting each year for the first three years of operation of the new ranges, and every three years thereafter. The purpose of this audit, the first since commencing of operation of the new ranges, is to satisfy Condition A11.

## 1.2 Audit objectives

The objectives of the audit are to meet requirement (iii) - (v) of Condition A11(a), and Condition(b) of the Modified approval.

Condition A11(a) of the states the audit must:

- i. be conducted by a suitably qualified, experienced and independent auditor whose appointment has been endorsed by the Secretary
- ii. include consultation with the relevant authorities
- iii. assess the environmental performance of the Project and assess whether it is complying with the requirements in this approval, and any other relevant approvals (including any assessment, plan or program required under these approvals)

- iv. review the adequacy of any approved strategy, plan or program
- v. recommend measures or actions to improve the environmental performance of the Project, and/or any strategy, plan or program required under these approvals.

Condition A11 (b) states, 'the first audit report prepared in accordance with Condition A11(a) must recommend appropriate operating hours for the continued operation of the complex based on the management activities implemented and compliance with the conditions of approval.

### 1.3 Audit scope

The scope of works undertaken to complete the audit included the following:

- review of compliance against documentation identified in the Modified approval (as it relates to the environmental aspects of the current SHRSC activities) and Conservation Agreement which included:
  - review of supporting plans developed as part of the CoA and assessment of their adequacy towards effective environmental performance
  - a site inspection to assess compliance against field implementation of the CoA and supporting plans
  - interviewing the Venue Manager and Office of Sport representative responsible for the SHRSC
  - review of site attendance and other relevant operational records
  - review of environmental monitoring reports
  - review of online information via the SHRSC website
- consultation with Wingecarribee Shire Council (WSC) the Southern Highlands Regional Fire Service (Hill Top Brigade)
- preparation of a draft report with results of compliance assessment issued to Office of Sport and Venue Manager for comment
- preparation of a final report issued for submission to the Department of Planning, Industry and Environment (DPIE).

The audit covers the annual period commencing 14 April 2019 (the first date of recorded public use) and is limited to assessing the activities completed during the audit period.

It is noted that during this period the Complex and surrounds were severely impacted by the December 2019 / January 2020 bushfire which affected a large portion of Greater Sydney and beyond, resulting in closure of the facility from 15 December 2019 - 7 February 2020.

Furthermore, it must be noted that completion of the audit at the end of the annual period was compromised by travel restrictions imposed by the Auditors home state in relation to the COVID-19 pandemic. This delayed the site inspection and ultimately completion of the information gathering component of the audit until November 2020. Under these circumstances the assessment of compliance for the audit period has needed to rely on observations of monitoring conducted by others, and at the time of inspection.

## 1.4 Audit criteria

The audit covered the following specifications and standards as they relate to operation of the Complex during the audit period. The documents relevant to the audit included:

- Conditions of Approval (Consolidated Approval MP 06\_0232 MOD 1 - MOD 5);
- Conservation Agreement (October 2010); and
- implementation of approved management plans detailed in Table 1.

The criteria developed for the audit are presented in Appendix B.

**Table 1.** Management plans audited.

Document	Scope / Relevance
Bushfire Management Plan (BMP)  (Building Code & Bushfire Hazard Solutions P/L dated 23 August 2018)	While the primary purpose of the BMP relates to life and property / asset protection implementation is required to consider conservation area management when formulating and undertaking activities such as hazard reduction. The BMP also addresses management of potential ignition sources associated with SHRSC activities.
Ecological Management Plan (EMP)  (GHD dated September 2010)	The EMP contains management procedures to minimise adverse impacts on biodiversity values on the site as a result of the Complex development within the SP1 zone and to guide the ongoing management of the natural areas outside of the developed range precincts.
Emergency Management Plan  (ComSafe Training Services dated January 2019)	Contingency for bushfire management which may minimise the impact of bushfire on the conservation area.
Operational Environmental Management Plan (OEMP)  (Arcadis dated 23 March 2019)	Primary document bringing together the environmental management measures of approved environmental sub-plans and operational controls to facilitate compliance with the CoA and associated sub-plans.
Water Cycle Management Plan (WCMP) incorporating the Soil and Water Management Plan (SWMP)  (ErSed Environmental dated August 2018)	The purpose of WCMP and SWMP is to minimise the risk to human health or the environment during the operational phases by reducing the potential for sediment, metal (and other) contamination to migrate to nearby sensitive receptors.

## 1.5 Limitations

The findings of this report are based on the objectives and scope of work outlined above. PE performed the services in a manner consistent with the normal level of care and expertise exercised by members of the environmental assessment profession. No warranties or guarantees, express or implied, are made. Subject to the scope of work, PE's assessment is limited strictly to identifying typical environmental conditions associated with the subject property, and does not include evaluation of any other issues.

This report does not comment on any regulatory obligations based on the findings, for which a legal opinion should be sought. This report relates only to the objectives and scope of work stated, and does not relate to any other works undertaken for the Client.

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The report and conclusions are based on the information obtained at the time of the assessment. Changes to the subsurface, site or adjacent site conditions may occur subsequent to the investigation described herein, through natural processes or through the intentional or accidental addition of contaminants, and these conditions may change with space and time.

The site history, and associated uses, areas of use, and potential contaminants, were determined based on the activities described in the scope of work. Additional site history information held by the Client, regulatory authorities, or in the public domain, which was not provided to PE or was not sourced by PE under the scope of work, may identify additional uses, areas of use and/or potential contaminants. The information sources referenced have been used to determine site history and desktop information regarding local subsurface conditions. While PE has used reasonable care to avoid reliance on data and information that is inaccurate or unsuitable, PE is not able to verify the accuracy or completeness of all information and data made available.

Further chemicals or categories of chemicals may exist at or adjacent to the site, which were not identified in the site history, and which may not be expected at the site. The absence of any identified hazardous or toxic materials on the subject property should not be interpreted as a warranty or guarantee that such materials do not exist on the site. If additional certainty is required, additional site history or desktop studies, or environmental sampling and analysis, should be commissioned.

The results of this assessment are based upon site inspection and fieldwork conducted by PE personnel and information provided by the client. Any samples collected at specific locations, should be considered to be an approximation of the condition of the sample.

All conclusions regarding the property area are the professional opinions of the PE personnel involved with the project, subject to the qualifications made above. While normal assessments of data reliability have been made, PE assume no responsibility or liability for errors in any data obtained from regulatory agencies, or information from sources outside of PE's control, or developments resulting from situations outside the scope of this project.

## 2 METHODOLOGY

### 2.1 Audit process

The audit was carried out with reference to Guidelines for Independent Audits (DPIE October 2015) and AS/NZS ISO 19011:2014: Guidelines for auditing management systems and comprised:

- development of a Terms of Reference developed which included:
  - audit scope and objectives
  - date and location of audit
  - members of audit team
  - list of people to be audited
  - list of reference documents and audit criteria
- liaison with the Office of Sport to confirm details of the Terms of Reference, site inspection logistics and request for documentation required prior to the site inspection component of the audit
- a site inspection and interview with key personnel
- review of records and other related documentation.

Details of the audit team are provided in Table 2. Appointment of the audit team was obtained from the DPIE on 17 July 2020 (Appendix C). An opening meeting and debrief / closeout were conducted prior and following the site inspection and interview to confirm the audit objectives and scope for the site inspection and initial findings. The SHRSC and OoS representatives involved in the audit process are detailed in Table 3.

**Table 2.** Audit team.

Team member	Role	Qualifications / experience
Adam Gilltrap	Team Leader	BAppSc (Env) - 17 years relevant experience
Luke Merzlikoff	Support auditor	BSc MEIANZ - 12 years relevant experience
Chris Butler	Support auditor	BEnvSc DipAppSc MEIANZ CEnvP (Site Contamination Specialist) - 20 years relevant experience
Greg Bartlett	Support auditor	BEnvSc - 16 years relevant experience

Note: Mr Bartlett is not part of the endorsed team however has acted as the field auditor in lieu of other member which were unable to travel to the site due COVID restrictions imposed by the home state of the audit team.

**Table 3.** Audit participants - SHRSC and OoS.

Participant	Organisation	Roles and responsibilities
Peter Lee	Office of Sport	Project Coordinator Works   Asset Management   Sport Infrastructure Group
Robyn Ginger	SHRSC	Venue Manager
Craig Ginger	SHRSC	Operations Coordinator

## 2.2 Site inspection scope

The site inspection was completed by the Field Auditor on 16 November 2020 under the escort of the Venue Manager and assistant. All operational areas within the developed precincts were inspected including the 50 m, 500 m and 800 m ranges, ancillary facilities, waste / recycling storage areas, and access tracks. The ranges were closed to shooting activity and there was maintenance activity at the time of the inspection.

Photographic evidence depicting the scope of the site inspection is provided in Appendix D.

## 2.3 Agency consultation

PE consulted with the agencies and stakeholders including Department of Planning, Industry and Environment (DPIE), NSW Biodiversity Trust Environment (BCT, as NSW Govt. representatives engaging in conservation management of private land) and the Rural Fire Service (RFS).

Email responses were received from the DPIE and BCT (Appendix E) and considered in the audit process. A response was not received from the RFS.

## 2.4 Compliance assessment criteria

Compliance assessment criteria adopted for the audit, and risk levels determined for identified non-compliances were derived from the Independent Audit Guidelines (NSW Govt 2015), as detailed in Table 4 and

Table 5.

**Table 4.** Compliance assessment criteria.

Assessment	Criteria
Compliant	Sufficient verifiable evidence has been collected to demonstrate that the intent and all elements of the requirement of the approval, or associated management plan, have been complied with within the scope of the audit.
Not verified	The auditor has not been able to collect sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit.  In the absence of sufficient verification, the auditor may have been able to verify by other means (visual inspection, personal communication, etc.) that a requirement has been met. In such situations the requirement has been assessed as not verified, and where relevant, noted that the auditor has no reasons to believe that the operation is non-compliant.
Non-compliant	Sufficient verifiable evidence has been collected to demonstrate that the intent of one or more specific elements of the regulatory approval have not been complied with within the scope of the audit.
Administrative non-compliance	A technical non-compliance with a regulatory approval that would not impact on performance, and that is considered minor in nature (e.g. report submitted but not on the due date, failed monitor or late monitoring session). This <u>does not</u> apply to performance-related aspects (e.g. exceedance of a noise limit) or where a requirement had not been met at all (e.g. noise management plan not prepared and submitted for approval).
Not triggered	The regulatory approval requirement has an activation or timing trigger that had not been met at the time of the audit inspection, therefore a determination of compliance could not be made.

Assessment	Criteria
Observation	Observations recorded where the audit identified issues of concern which do not strictly relate to the scope of the audit or assessment of compliance. Further observations are considered to be indicators of potential non-compliances or areas where performance may be improved.
Note	A statement or fact, where no assessment of compliance is required.

**Table 5.** Risk levels for non-compliance.

Risk level	Colour code	Description
High		Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence
Medium		Non-compliance with: <ul style="list-style-type: none"> <li>potential for serious environmental consequences, but is unlikely to occur; or</li> <li>potential for moderate environmental consequences, but is likely to occur</li> </ul>
Low		Non-compliance with: <ul style="list-style-type: none"> <li>potential for moderate environmental consequences, but is unlikely to occur; or</li> <li>potential for low environmental consequences, but is likely to occur</li> </ul>
Administrative non-compliance		Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions)

### 3 AUDIT FINDINGS

The audit findings must be read in conjunction with the complete report including the limitations in Section 1 and the appendices.

#### 3.1 Agency and community consultation

Consultation with relevant agencies included provision of the audit terms of reference and invitations to raise any questions, concerns, or particular areas of interest it may have with the SHRSC with respect to environmental management.

Matters raised by DPIE were general focus on noise, soil and water quality monitoring and management - these elements were an inherent focus of the audit arising from the CoA and management plans.

Response from BCT highlighted the agencies interest in cooperation by the SHRSC in threatened fauna species recovery, in particular those with existing recovery plans or strategies being Yellow Bellied Glider, Koala and Powerful Owl have 'Recovery Plans'. Further to this, BCT provided clarification on the responsibilities of the OoS (as Owners of the Hill Top Conservation Area) under the Conservation Agreement between it (formerly the Minister administering the Sporting Venues Authority Act) and the Minister for the Environment.

The abovementioned correspondence is included in Appendix E.

#### 3.2 Audit checklist

The audit criteria checklist and compliance assessment are provided in Appendix B. Site inspection photos including evidence of compliance are provided in Appendix D.

#### 3.3 Compliance summary

##### 3.3.1 Conditions of approval and associated management plans

A summary of compliance assessment results is provided in Table 6. The inter-relationship between the CoA and Conservation Agreement and associated management plans must be considered when interpreting the summarised results. Assessment relating to specific elements of the approved management plans are in certain circumstances a reflection on compliance with the more general requirements or intent of CoA and/or Conservation Agreement. Furthermore, the requirements of the OEMP are largely an aggregation of the requirements of element based management plans.

Separate assessment of such requirements is problematic in that multiple assessments may be recorded against the same or similar requirement, for e.g. where a management plan requirement addresses a CoA, or a requirement of an element based management plan is reinforced in the OEMP. Accordingly, the compliance assessment results for the CoA should be viewed in conjunction with that for management plans. Relevant cross-referencing is detailed in the compliance assessment checklist.

The low risk non-compliance relates to the absence of threatened species identification cards onsite.

**Table 6.** Compliance assessment summary.

	NC	Ad NC	NV	Obs
CoA and Conservation Agreement	-	1	6	-
Management Plans	1 (low risk)	2	21	9

Notwithstanding the number of items which could not be verified, the SHRSC was considered to have achieved strong environmental performance based on the compliance assessment.

While not assessed as non-compliance, a number of observations have implications for environmental management, in particularly those relating to fire suppression.

The primary purpose of Asset Protection Zones (APZs) is the protection of human life and property / assets, however APZ and Strategic Fire Advantage Zones (SFAZ) may also serve to mitigate the spread of fire to natural assets.

Localised APZs for 50 m and 500 m range built structures constructed as part of new ranges. These essentially comprise hardstand with the exception of a small area of vegetation to the north of the 500 m range building. Expansion of the APZ at the 800 m range clubhouse has been completed. However provision of firefighting resources and construction of additional fire trails for this location, and expansion of other APZ, specified in the BMP are subject to approval by relevant authorities and Treasury funding.

Furthermore, the BMP identifies a broadscale APZ for the 50 m and 500 m ranges as per the W/W BFRMP 2017 and states the OoS should liaise with the NPWS and RFS to clarify the boundary's so as to ensure ecological compliance and formal APZ set-backs. It is understood SHRSC management regularly liaise with the Rural Fire Service (RFS), and the site has been attended by BCT, however formal inspection/s for the purpose of better defining and managing this APZ and proposed future SFAZs has not been undertaken.

### 3.3.2 Commitments and key features

A key feature of the SHRSC is the conservation values of bushland (effectively the range buffer/danger zone) immediately surrounding the developed areas which forms part of the complex. The land was excised from the Bargo State Conservation Area to form the Hill Top Conservation Area. This process involved formulation of the Conservation Agreement between the OoS (formerly the Minister administering the Sporting Venues Authority Act) and the Minister for the Environment.

The audit did not identify any non-compliance with the Conservation Agreement requirements and conservation area monitoring did not identify any deterioration of conservation values as a result of SHRSC activities.

### 3.3.3 Incidents and corrective actions

Excluding the 2019 / 2020 bushfire which effected Wattle Ridge along with other significant areas of NSW there was no evidence of any environmental incidents or complaints. While interviews with the nearest sensitive noise receptor was not conducted, noise monitoring results complied with the CoA and there was no cause for concern regarding noise impacts to these receptors.

### 3.3.4 Adequacy and review of management plan

The audit did not identify any deficiencies in the management plans, however the 2019 / 2020 bushfire and completion of this inaugural independent audit provide a trigger for review of the BMP and OEMP in accordance with these documents.

### 3.3.5 Improvement opportunities

The following opportunities to further the environmental performance or outcomes of the SHRSC, and/or abate potential non-compliance were identified during the audit:

- 1) Increased engagement with BCT and other stakeholder government agencies recommended by BCT and documentation of outcomes - such engagement would benefit the SHRSC in terms of:
  - a. understanding and fulfilling its conservation agreement responsibilities beyond the limits of the developed area (Zone 1) going forward - this will become increasingly relevant given the potential for more active land management by the OoS across the complex's conservation areas during bushfire regeneration.
  - b. ensuring efficient use of resources given the overlap and potential for integrating land management practices within the with the Hill Top Conservation Area with those implemented for the Nattai Reserves and Bargo State Conservation Area (e.g. invasive species management, threatened species recovery).
- 2) Formal inspection requests to RFS and Wingecarribee Council for support (site inspections, advice, implementation) regarding defining and managing APZs and SFAZs - this should involve consultation with BCT so as to ensure ecological objectives are incorporated in any fire management activities (e.g. joint stakeholder meetings).
- 3) Review of appropriate triggers and methods for projectile recovery based on stopbutt design, current and potential future shooter activity, soil and water quality monitoring results, and feasibility of various recovery methods.
- 4) Investigation of the use of ground limestone (assumedly as an alternative to fine lime) as a longer term solution for soil pH control (as recommended in the March 2020 monitoring report).
- 5) Commencement of trend analysis of soil and water quality results for lead and other identified contaminants of concern.
- 6) Review of weed control methods permitted under Annexure C - Item 1 of the Conservation Agreement which, without DPIE consent to engage in alternative methods (e.g. spot-spraying), is currently limited to herbicide cut / paint, and manual methods. This may have implications for effective and cost-efficient weed control during bushfire regeneration of bushland. The review should involve consultation with the BCT with input from a suitably qualified ecologist where required. The review should also include activities within the developed area to clarify any potential issues with compliance with this part of the agreement.
- 7) Maintenance of operational journal or alternative records (e.g. photo evidence, meeting minutes) to improve documented evidence of compliance (to the extent reasonably practical) - such records should include, yet not be limited to, those for:
  - a. Site inspection of stopbutts and projectile accumulation
  - b. lime application to soil and water treatment trains (quality, quantity and methodology)
  - c. Irrigation of non-landscaped areas
  - d. Liaison with RFS, NPWS and other stakeholders

### 3.4 Review of hours of operation

Condition A11 (b) states, 'the first audit report prepared in accordance with Condition A11(a) must recommend appropriate operating hours for the continued operation of the complex based on the management activities implemented and compliance with the conditions of approval.

The current permitted 'Hours of Use – Outdoor Ranges' under Condition A7 of the Consolidated Approval (MOD 5) are as follows:

- a) All outdoor ranges shall not operate for more than 4 four days in any week, Mondays to Sundays (i.e. there shall be no shooting on any outdoor range for at least 3 three days a week). The hours of use of the outdoor ranges on these 4 four days shall be between 10 am and 5 pm each day. No shooting is permitted on any of the outdoor ranges after 5 pm, except for Special Events (refer to Condition A10).
- b) Shooting on public holidays is not permitted except for Special Events (refer to Condition A10).

While shooter activity during the audit period was below the permitted number of shooters, and the complex was closed during the December 2019 / January 2020 bushfire, noise monitoring has demonstrated compliance with the CoA noise limits under these operating conditions. Furthermore, no noise related (or other) complaints were received during the first year of operation of the new ranges.

To facilitate better utilisation of the facility, the OoS and SHRSC management have requested an increase in the hours (days) of use be considered, as follows:

- a) All outdoor ranges shall not operate for more than 5 five days in any week, Mondays to Sundays (i.e. there shall be no shooting on any outdoor range for at least 2 two days a week). The hours of use of the outdoor ranges on these 5 five days shall be between 10 am and 5 pm each day. No shooting is permitted on any of the outdoor ranges after 5 pm, except for Special Events 1) and 2) (refer to Condition A10).
- b) Shooting on public holidays is not permitted except for Special Events (refer to Condition A10).

Based on the noise monitoring results and other relevant findings of the audit, there is justification to advance the proposed increase in the number of days of operation. It is recommended that the initial stages of the review should involve:

- expert review of the potential impacts of the proposed changes, including type and frequency of all permitted firearms, against Environmental Protection Agency guidelines (Target Shooting Ranges Application Note for Assessing Noise Compliance)
- notification of the proposed changes and consultation with identified sensitive receptors. Subject to the outcomes of the consultation (namely objections).

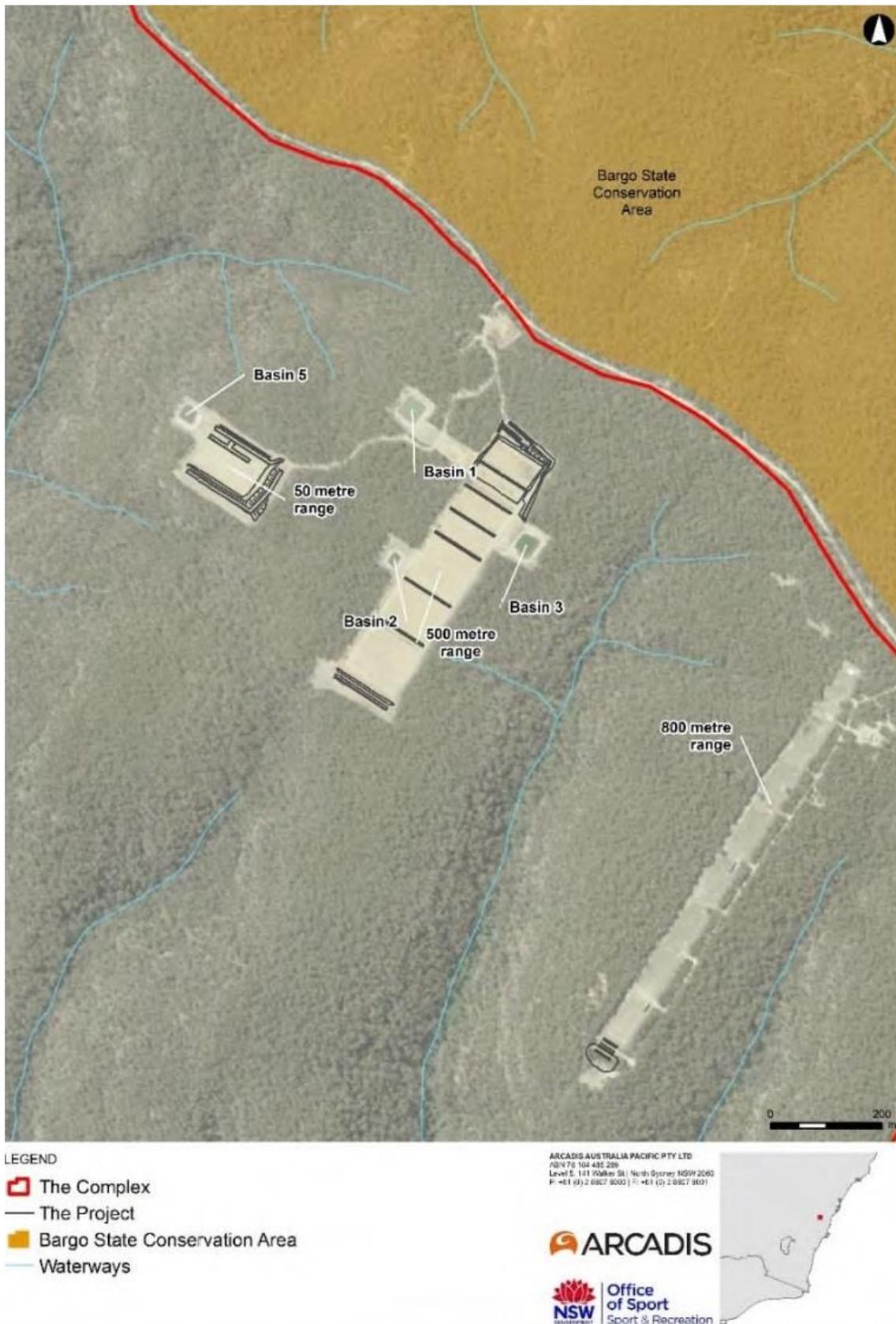
Should the proposal be found acceptable based on the above, a trial period would provide an opportunity to assess potential noise impacts to the community, and mitigate these accordingly (e.g. modifying the hours of use on any given day).

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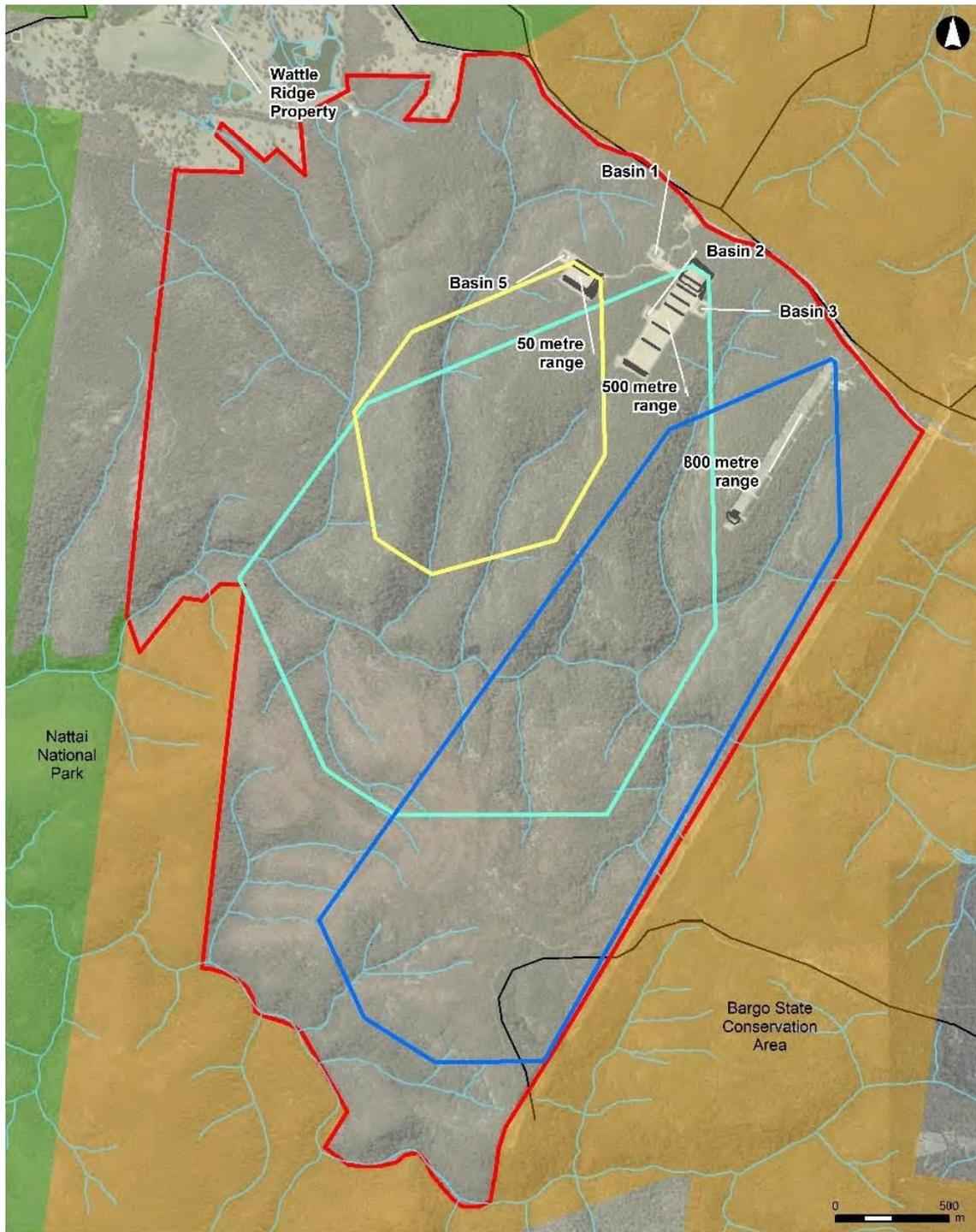
## **APPENDIX A: FIGURES**

Figure 1. General site layout

Figure 2. Extents of complex



**Figure 1.** SHRSC - general layout (Sourced: Operational Environmental Management Plan, Arcadis 2019).



LEGEND

- The Complex
- The Project
- 800 metre range danger area
- 500 metre range danger area
- 50 metre range danger area
- Nattai National Park
- Bargo State Conservation Area
- Roads
- Waterways

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Figure 2. SHRSC - complex limits (Sourced: Operational Environmental Management Plan, Arcadis 2019).

## **APPENDIX B: COMPLIANCE & RISK ASSESSMENT**

**Table B1.** Compliance assessment checklist.

<b>CONDITIONS OF APPROVAL</b>			
<b>CONDITION / REQUIREMENT</b>	<b>COMMENTS</b>	<b>EVIDENCE</b>	<b>COMPLIANCE</b>
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>SCHEDULE 2</b>			
<b>A6 - Use of existing 800 m range</b>			
Saturdays and Sundays between 10 am and 5 pm, as per Sch 4 of approval, until the range is used for 4 days per week.	Saturday / Sunday use only with occasional exception commencing April 2019.	Discussion - Venue Manager (VM) SHRSC attendance records (April 2019 - April 2020)	C
4 days per week (including weekends) subject to an Interim Operational Management Plan (OMP).	Saturday / Sunday use only with occasional exception commencing April 2019 (i.e. following preparation of OEMP).	Discussion - Venue Manager (VM) SHRSC attendance records (April 2019 - April 2020)	C
Preparation and scope of Interim OMP.		OEMP (Arcadis 2019) dated 28/03/2019 - Update following DP&E Approval of OEMP and FAR Range Licence Issue	C
<b>A7 - Hours of use (outdoor ranges)</b>			
Ranges shall not operate for more than 4 days in any week, Mondays to Sundays between 10 am and 5 pm.  No shooting outside of these days, or after 5 pm except for Special Events (refer to Condition A10).		Discussion - Venue Manager (VM) SHRSC attendance records (April 2019 - April 2020)	C

CONDITIONS OF APPROVAL			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>A8 - Hours of use (indoor ranges)</b>			
Operation permitted 7 days per week only between 9 am and 5 pm and only 3 nights per week only between 5 pm and 10 pm. Shooting on public holidays is not permitted except for Special Events (refer to Condition A10).	No recorded use outside 10:00 AM - 5:00 PM or public holidays.	Discussion - Venue Manager SHRSC attendance records (April 2019 - April 2020)	C
<b>A9 - Firearm noise</b>			
Noise from firearms or use of the site must not exceed LZpeak 75 dB at the residences nominated in Condition A9.  The assessment of noise compliance from the SHRSC shall be undertaken in accordance with the EPA's Target Shooting Ranges: Application Note for Assessing Noise Compliance (2015).	Activity reported as compliant.	Noise monitoring reports - Wilkinson Murray (April 2019 - Feb 2020)	C
<b>A10 - Special events</b>			C
Up to three Special Events can be staged each year, including on public holidays.  A Special Event Management Plan (SEMP) must be prepared, submitted to and approved by the Secretary, in accordance with Condition A10 (b) & (c).	One event - WA1500 - World Championships (7-14 September 2019).	Discussion - Venue Manager (VM) Southern Highlands Regional Shooting Complex – Special Event Management Plan (NSW Office of Sport 2019)  DPIE correspondence dated 26 Aug 2019	C

CONDITIONS OF APPROVAL			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
<b>C</b> - Compliant; <b>NV</b> - Not verified; <b>NC</b> - Non-compliant; <b>Ad NC</b> - Administrative non-compliance; <b>NT</b> - Not triggered; <b>Obs</b> - Observation			
At least one week prior to the commencement of any Special Event, the proponent must notify the community and make public the SEMP in accordance with Condition A10 (d) & (e).	One special event during audit period - WA1500 World Championships	Discussion - Venue Manager (VM) Newspaper advertisements dated 24/01/2019  <a href="https://www.sport.nsw.gov.au/shootingcentre/SHRSC/special-event-management-plans">https://www.sport.nsw.gov.au/shootingcentre/SHRSC/special-event-management-plans</a>	C
<b>A11A - Firearm noise monitoring</b>			
The noise monitoring requirements specified in (a), (b) & (c) of Condition A11A shall apply to the first use of the 800 m range for four days a week and the first use of the new 50 metre and 500 metre ranges.  (a) ....quarterly for the first 12 months... and annually thereafter....	First monitoring event - 7 April 2019. Second monitoring event - 17 August 2019. Third monitoring event - 6 November 2019. Fourth monitoring event - 23 February 2020.  Negligible delay in second monitoring event (due July 2019) due to consultant and SHRSC seeking clarification on methodology.	Noise monitoring reports - Wilkinson Murray (April, August, November 2019 and Feb 2020).	C
(b) The first round of noise monitoring must be undertaken on the first occasion of use or as soon as practicable thereafter....	First recorded use (attendance records) - 6 April 2019. First monitoring event - 7 April 2019.	Attendance records. Noise monitoring reports - Wilkinson Murray (April 2019).	C
(c) noise monitoring results must be posted within seven days on the proponent's website and submitted to the Secretary and to Council....	Date of posting not verifiable however no evidence of non-compliance.	<a href="https://www.sport.nsw.gov.au/shootingcentre/SHRSC/compliance">https://www.sport.nsw.gov.au/shootingcentre/SHRSC/compliance</a> (accessed 03/09/2020)	C

CONDITIONS OF APPROVAL			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>A13 - Compliance with Relevant Legislation and Australian Standards</b>			
Compliance with all relevant Australian Standards and Codes (including Building Code of Australia).	50 m & 500 m ranges and ancillary structures compliant on completion of construction.  Verification of standard and code compliance with any other aspects of the site is beyond scope of audit, however no evidence or reason to suggest non-compliance.	Building certification dated 1 March 2010.	C
Obtain all necessary approvals required by State and Commonwealth legislation in undertaking the project.	Development assessment and approval process provided NSW DP&E determination (online) and described in CEMP (Arcadis 2017) and OEMP (Arcadis 2019).	<a href="http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&amp;job_id=1051">http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&amp;job_id=1051</a>  CEMP (Arcadis 2017) OEMP (Arcadis 2019)	C
<b>B2 - Ecological Management Plan (EMP)</b>			
An EMP shall be submitted and approved by the Secretary prior to the commencement of any new works on the site. Refer Condition B2 for scope requirements.	Documented evidence of Secretary approval not sighted however reasonably assumed as approved based on SHRSC website statement and other lines of evidence.	EMP (GHD 2010)  <a href="https://www.sport.nsw.gov.au/shootingcentre/SHRSC/approved-operational-plans">https://www.sport.nsw.gov.au/shootingcentre/SHRSC/approved-operational-plans</a>	C
<b>B3 - Soil, Water and Contamination</b>			
A detailed Water Cycle Management Plan (WCMP) for the operation of the complex must be prepared in consultation with the EPA and WaterNSW and be submitted to the satisfaction of the Secretary prior to the construction of the new ranges. Refer Condition B3 for scope requirements.		Water Cycle Management Plan (ErSed 2018)  Letter of DP&E approval dated 6/12/18	C

CONDITIONS OF APPROVAL			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>B4 - Shotgun range pond</b>			
The shotgun range pond is to be relocated to the north, outside the watercourse. Refer Condition B4 for location and design requirements.			NT
<b>B5 - Earthworks for Sedimentation Ponds</b>			
All earthworks associated with the construction of sedimentation ponds are to be located at least 20 metres from any watercourse.		Site inspection	C
<b>C1 - Vegetation clearance</b>			
<p>The vegetation clearing for the shooting ranges, internal roads and facilities shall be undertaken in a staged manner.</p> <p>Approval is granted for the clearing of vegetation associated with the 500 m rifle range, 50 m pistol range, clubhouse and ancillary works.</p> <p>Until such as time as construction of the clubhouse commences, the cleared area for the clubhouse building is to be revegetated and not to be used for parking.</p> <p>Prior to any further vegetation clearing for any other ranges and/or facilities, written authorisation shall be obtained from the Secretary once ....., and that a management plan for the additional clearing has been approved by the Secretary.</p>	<p>Clearing for 500 m rifle range, 50 m pistol range, and ancillary works were completed in 2010-11.</p> <p>No clearing during operation phase.</p>		NT

CONDITIONS OF APPROVAL			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>C2 - Rural Fire Service Requirements</b>			
At the commencement of buildings works and in perpetuity the property around the proposed clubhouse and indoor air pistol range shall be managed as per set-backs specified in Condition C2.			NT
Water, electricity and gas are to comply with sections 4.1.3 and 4.2.7 of Planning for Bush Fire Protection 2006 for the proposed clubhouse and indoor air pistol range.			NT
New construction shall comply with Australian Standard AS3959-1999 Construction of buildings in bush fire-prone areas Level 1 for the proposed clubhouse and air pistol range.			NT
Arrangement for emergency evacuation are to comply with section 4.2.7 of Planning for Bush Fire Protection 2006.		BMP (Building Code & Bushfire Hazard Solutions P/L 2018)  Emergency MP (ComSafe Training Services 2019)	C
<b>C3 - Imported Soil</b>			
Only VENM or ENM may be used as fill on the site, with accurate records kept of the volume, location and type of fill to be used; and made available to the Department or EPA upon request.	Advised no material imported to site.  No evidence or reason to suggest non-compliance.	Discussion - Venue Manager (VM) and OoS	NV

CONDITIONS OF APPROVAL			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>D2 - Operational Environmental Management Plan (OEMP)</b>			
An Operational Environmental Management Plan should be prepared in consultation with the EPA and to the satisfaction of the Secretary prior to commencement of use of the new ranges. Refer Condition D2 for scope requirements.	Documented evidence of Secretary approval and/or EPA consultation not sighted however reasonably assumed as compliant based on SHRSC website statement and other lines of evidence including OEMP (Section 3.5) 'record of consultation'.	OEMP (Arcadis 2019)	C
<b>D6 - Removal of Trees</b>			
Trees along the embankment of the existing dam, adjacent to the proposed new clubhouse, are to be removed prior to the commencement of use of the new ranges.		Site inspection Google Earth image dated 01/04/2019	C
<b>E3 - Sedimentation Ponds</b>			
The embankments of all sedimentation ponds must be kept clear of trees, to minimise the possibility of damage to the dam.		Site inspection Google Earth image dated 01/04/2019 and 07/09/2020	C

CONDITIONS OF APPROVAL			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>E5 - Access to Information</b>			
The proponent must make copies of the information detailed in Condition E5 publicly available on its website, and keep this information up to date, to the satisfaction of the Secretary.	<p>Information required under Condition E5 not available on the SHRSC website at the time of audit:</p> <ul style="list-style-type: none"> <li>Southern Highlands Regional Shooting Complex (SHRSC) Sampling And Analysis Quality Plan &amp; 2020 Annual Operational Monitoring Program Report (ErSed 2020)</li> <li>Conservation Area Monitoring And Biometric Condition Assessment Southern Highlands Regional Shooting Complex (Lesryk Environmental 2019)</li> <li>Complaints Register (NOTE: no complaints received - refer E7).</li> </ul>	<a href="https://www.sport.nsw.gov.au/shootingcentre/SHRSC">https://www.sport.nsw.gov.au/shootingcentre/SHRSC</a>	Ad NC
<b>E6 - Complaints Procedure</b>			
The proponent must ensure that the means of contact detailed in Condition E6 are available on the proponent's website for community complaints.		<a href="https://www.sport.nsw.gov.au/shootingcentre/SHRSC">https://www.sport.nsw.gov.au/shootingcentre/SHRSC</a>	C
<b>E7 - Complaints Register</b>			
The proponent must record details listed in Condition E7 for all complaints received through the means listed under Condition E6 in an up-to-date Complaints Register.	Advised no complaints received.	Discussion - Venue Manager (VM) and OoS	NT

CONDITIONS OF APPROVAL			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>SCHEDULE 3</b>			
<i>Refer Construction Environmental Management Plan</i>			
<b>SCHEDULE 4</b>			
<b>Item 1</b>			
A Facility Management Strategy must be implemented which includes ... the recording of the number of shooters, vehicles and visitors using / at the facility, and the start and finish times.		OEMP - Section 2.3 (Arcadis 2019) SHRSC attendance records (April 2019 - April 2020) including Item 1 information requirements.	C
<b>Item 2</b>			
The strategy must also provide for: <ul style="list-style-type: none"> <li>• security so that only authorised usage occurs</li> <li>• enforcing the approved limits on the number of shooters</li> <li>• complying with the approved hours of operation.</li> </ul>		OEMP - Section 2.3 (Arcadis 2019)	C
<b>Item 4</b>			
The licensee must provide Council with an Operational Environmental Management Plan (OEMP) to address any existing and potential impacts upon water quality arising from the use of the facility.	Consultation with Water NSW (as per Item 4) inferred in OEMP.  No evidence or reason to suggest non-compliance.	OEMP (Arcadis 2019)  Email correspondence dated 03/06/2019	C

CONDITIONS OF APPROVAL			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>Item 5</b>			
The number of shooters on the property must not exceed those specified in Item 5.	Schedule 4 - Item 5 shooter number superseded following approval of Interim OEMP.  Shooters per day per range were compliant with those detailed in Section 2.3.3 of the OEMP as per Preferred Project Report (GHD 2008).	SHRSC attendance records (April 2019 - April 2020)	C
<b>Item 6</b>			
The licensee shall provide a report on each anniversary of this approval providing such information as required by Council to substantiate compliance with the above (Schedule 4) conditions of approval.	Requirement for annual report to Council regarding Schedule 4 compliance superseded following approval of the OEMP (Arcadis 2019).		NT

CONSERVATION AGREEMENT (Oct 2010)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>2.1 - General responsibilities</b>			
Except as otherwise permitted by this Agreement, the Owner must not intentionally .... harm any native fauna, native plants, their habitats, cultural heritage, geo-heritage or other conservation values in the conservation area.	No evidence or reason to suggest non-compliance.		NV
<b>2.2 - Development</b>			
Except as permitted in this Agreement the Owner shall not construct any new road, access track, building or internal fencing or any development that could adversely affect the conservation values of the conservation area.	Tracks and structures as per approvals.	Site inspection Discussion - Venue Manager (VM) Google Earth image dated 01/04/2019 and 07/09/2020 2019/20 Annual Report (ErSed 2020)	C
<b>2.3 - Development</b>			
Activities permitted under the agreement are limited to those detailed in Item 2.3, being the maintenance of nominated tracks, specific operations within Zone 3, future permitted development for Zone 2 and Zone 3, range danger area (safety zone) in Zone 1, and signage for management and safety purposes.	Activities as per approvals.	Site inspection Discussion - Venue Manager (VM) Google Earth image dated 01/04/2019 and 07/09/2020 2019/20 Annual Report (ErSed 2020)	C
<b>2.4 - Subdivision</b>			
The Owner must not subdivide or permit the subdivision of the conservation area.		NSW Six Maps Cadastral database (accessed 23/11/2020)	C

CONSERVATION AGREEMENT (Oct 2010)			
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C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>2.5 - Threatened species, ecological communities, populations and their habitats and critical habitat</b>			
The Owner must manage the conservation area to protect and promote recovery of threatened species, populations and ecological communities that are endangered, and their habitat as per Item 2.5.1 - 2.5.4.		Site inspection Discussion - Venue Manager (VM) and OoS CAMBCA report (Lesryk 2019)	C
<b>2.6 - Fire</b>			
The Owner must not light a fire, or cause a fire to be lit on the conservation area, unless it complies with the Rural Fires Act, 1997, and the provisions of Item 2.6.	No evidence or reason to suggest non-compliance.	Site inspection Discussion - Venue Manager (VM)	NV
<b>2.7 - Cultural Heritage</b>			
The Owner must preserve and protect Aboriginal places and Aboriginal objects on the conservation area.	It is understood that consultation with LALC was undertaken during the development design phase (circa 2010) when anecdotal information identified one area of interest known as 'Hill 1' near Wattle Ridge Rd - the presence of artefacts could not be verified at the time and are not known to exist.	Discussion - Venue Manager (VM) and OoS	NT
<b>2.8 - Cultural Heritage</b>			
The Owner must obtain appropriate permits and consents if there is any potential to impact on Aboriginal objects.	No activities identified with potential impacts to Aboriginal objects.	Site inspection Discussion - Venue Manager (VM)	NT

CONSERVATION AGREEMENT (Oct 2010)			
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C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>2.9.1 - Control of non-indigenous plants and fauna</b>			
Except as permitted in this Agreement the Owner must use their best endeavours to control, and where possible remove, all non-indigenous plants and non-indigenous fauna from all zones of the conservation area identified to have significant detrimental impacts on the conservation area.	Refer following sections - BMP, EMP, OEMP.		
<b>2.9.2 - Control of non-indigenous plants and fauna</b>			
Except as permitted in this Agreement the Owner must take such reasonable measures in relation to the control of non-indigenous plants, non-indigenous fauna and pest animals as specified in the Management Scheme (Annexure C).	Refer following sections - BMP, EMP, OEMP.		
<b>3.1 - Management of the land</b>			
The Owner must manage the conservation area in accordance with this Agreement.	Refer following sections - BMP, EMP, OEMP.		

CONSERVATION AGREEMENT (Oct 2010)			
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C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>3.2 - Management of the land</b>			
The Owner must inform the Director-General (Secretary) as soon as practicable after becoming aware of the deterioration of any of the natural values or cultural values of the conservation area, or of any threat to these values.	<p>Severe bushfire event (Dec 2019 / Jan 2020) and drought has occurred - the full impacts of which were recently accessed (Conservation Area Monitoring and Biometric Condition Assessment (CAMBCA) - Lesryk Environmental dated 03/09/2019).</p> <p>Report submitted to Biodiversity Conservation Trust (BCT) as most relevant government agency.</p> <p>The bushfire event was managed and investigated at State level.</p> <p>While the intent of this requirement is likely to relate to deterioration of natural or cultural values as a result of SHRSC operation, and the Director-General (Secretary) should be aware of impacts of the bushfire on the conservation area, it would be prudent to submit the CAMBCA report to the Secretary.</p>	Email submissions to BCT	C
<b>4 - Use of The Land By Servants, Agents, Lessees or Licensees</b>			
The Owner must incorporate the terms of this Agreement in any lease or licence issued or reviewed over the conservation area, and at all times ensure that any servant, contractor, consultant, agent, lessee, licensee occupying the conservation area shall be aware of the relevant provisions of this Agreement.	NSW Sport and VM familiar with OEMP (Arcadis 2019).	<p>Site inspection</p> <p>Discussion - Venue Manager (VM) and OoS</p>	C

CONSERVATION AGREEMENT (Oct 2010)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>5 - Change of Ownership</b>			
The Owner must notify the Director-General (Secretary) in writing of any change of ownership or control of the conservation area within 28 days after the change of ownership and control. The notice must include the name and address of the new owner.		Discussion - OoS	NT
<b>Annexure C - Item 1</b>			
Control of weeds and pest animals may be undertaken only in accordance with the provisions of Item 1 (a) and (b).	<p>VM advised that vegetation management (including invasive plants) is undertaken as necessary by contractors – typically fortnightly or monthly.</p> <p>Infestations are inspected annually by a qualified ecologist as part of the CAMBCA monitoring.</p> <p>There was visual evidence of spot spraying of weeds, and herbicide application records were sighted.</p> <p>Item 1 permits herbicide cut / paint, and manual methods.</p> <p>Item 1(a) of the Agreements states 'Other weed control methods may be undertaken with prior written permission of the Director-General.'</p> <p>It is reasonable to assume the restrictions around weed control methods pertain primarily to areas outside of the SHRSC developed areas.</p>	<p>Site inspection</p> <p>Discussion - Venue Manager (VM) and OoS</p> <p>Weed management contractor invoices.</p> <p>Internal correspondence re: wild dog control (Oct 2019)</p> <p>CAMBCA report (Lesryk 2019)</p>	C

**CONSERVATION AGREEMENT (Oct 2010)**

CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
<p><b>C</b> - Compliant; <b>NV</b> - Not verified; <b>NC</b> - Non-compliant; <b>Ad NC</b> - Administrative non-compliance; <b>NT</b> - Not triggered; <b>Obs</b> - Observation</p>			
	<p>Furthermore, herbicide cut / paint methods are not suitable for all soft weed control required within the developed area, and manual methods are inefficient and can exacerbate weed growth compared to herbicide application.</p> <p>It is considered that when undertaken by a qualified and experienced technician (as has been the case) spot spraying can be undertaken in an environmentally sensitive manner, as an economical and practical alternative to the permitted methods which are not well suited to management of broader areas of 'soft' weeds.</p> <p>While the methods applied are not strictly in accordance with the agreement, the management approach is considered to meet the intent of the requirement - compliance has not been determined on this basis.</p> <p>Nevertheless, it is recommended that advice is sought from a suitably qualified ecologist regarding alternative weed control methods, and permission to implement such methods is sought from the appropriate agency.</p> <p>Wild dog trapping was recommended by NPWS - a PO was raised in Oct 2019.</p> <p>Pest animal control was not included in recommended actions arising from CAMBCA report (Lesryk 2019).</p>		

CONSERVATION AGREEMENT (Oct 2010)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
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No domestic animals, livestock, or horse riding is permitted within the conservation area.	<p>None observed during site inspection.</p> <p>No evidence or reason to suggest non-compliance.</p>	<p>Site inspection</p> <p>Discussion - Venue Manager (VM)</p> <p>Range rules (July 2017)</p>	C
Fire management may be undertaken only in accordance with the provisions of Item 1 (e) - (i).	<p>Fire management undertakings by SHRSC within developed area.</p> <p>Hazard reduction outside of the SHRSC developed area is undertaken by the RFS.</p> <p>Dec 2019 / Jan 2020 bushfire subject to State coordinated response.</p>	<p>Discussion - Venue Manager (VM)</p> <p>Land management contractor invoices</p> <p>Fire Safety Statements (Dec 2019)</p> <p>RFS hazard reduction notifications (April 2019)</p>	C
<p>Vehicle access to Zone 3 is permitted only on existing formed access roads within designated operating hours.</p> <p>Vehicle access within Zones 1 and 2 is only permitted to formed trails for management purposes as approved by the Department, firefighting or any emergency requirements.</p>	<p>Fire trail at rear to south of property near Hill Top Village does not encroach on range.</p> <p>The CAMBCA report (Lesryk 2019) identifies apparent use of the Zone 1 track however the type of use is unknown.</p>	<p>Site inspection</p> <p>Discussion - Venue Manager (VM)</p>	NV
No harvesting of fallen timber, except for hazard reduction purposes within defined asset protection zones, permitted within the conservation area.	<p>Fallen timber retained for hollows for animal refuge.</p> <p>No evidence or reason to suggest non-compliance.</p>	<p>Site inspection</p> <p>Discussion - Venue Manager (VM)</p>	NV
Hollow bearing trees and stag trees along roads and tracks and within car park areas must be retained within Zones 2 and 3, where those trees do not pose a hazard to people or property.		<p>Site inspection</p> <p>Discussion - Venue Manager (VM)</p>	C

CONSERVATION AGREEMENT (Oct 2010)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
<p><b>C</b> - Compliant; <b>NV</b> - Not verified; <b>NC</b> - Non-compliant; <b>Ad NC</b> - Administrative non-compliance; <b>NT</b> - Not triggered; <b>Obs</b> - Observation</p>			
<p>Any measures included in relevant recovery plans for any threatened species or communities which or may be found in the conservation area, including the recovery plan for Yellow-bellied Glider, must be implemented.</p> <p>Other specific management advice from the Department for any threatened species or communities which are or may be found in the conservation area, must be implemented.</p>	<p>Nil fire suppression operations within developed area.</p> <p>SHRSC was inspected by the Biodiversity Conservation Trust (BCT) following the Dec 2019 / Jan 2020 bushfire during which advice was provided on maintenance and recovery after the fires. The main actions requested pertained to erosion and sediment control (ESC) within the developed area which may impact the recovery of adjacent bushland.</p> <p>A majority of actions have been implemented with some not completed initially due to availability of the preferred ESC control devices effected by COVID19 supply issues.</p> <p>The SHRSC has not been requested to participate in any specific recovery plans.</p>	<p>Discussion - Venue Manager (VM)</p> <p>Site inspection</p> <p>Consultation with BCT.</p>	<p>C</p>
<p>Restoration of native vegetation shall use natural regeneration, including brush mulching as the preferred method.</p> <p>Revegetation to establish indigenous plants, shall use species produced from material sourced locally and without fertilisers only where the ability to regenerate naturally within a reasonable time frame has been lost, or to prevent soil erosion.</p>			<p>NT</p>

CONSERVATION AGREEMENT (Oct 2010)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
<b>C</b> - Compliant; <b>NV</b> - Not verified; <b>NC</b> - Non-compliant; <b>Ad NC</b> - Administrative non-compliance; <b>NT</b> - Not triggered; <b>Obs</b> - Observation			
Thinning of regenerating indigenous species shall only be undertaken where these plants are altering the structure of the vegetation and/or reducing conservation values, and undertaken in consultation with the Department.			NT
Any collection of seed may be undertaken in keeping with Guidelines for Collection of Seed, and other Plant Propagation material (available from the Department), and limitations and permissions detailed in Item 1 (s).			NT
Any recording and management of any newly identified Aboriginal objects, shall be undertaken in consultation with the Department (and the Aboriginal community where applicable.)			NT
Visitation, research and community shall be at a level that does not adversely impact on the conservation values of the area or the amenity of the Owner consistent with any operations and access protocols for the conservation area.  Research projects should be discussed with the Department prior to commencement.			NT

CONSERVATION AGREEMENT (Oct 2010)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
<b>C</b> - Compliant; <b>NV</b> - Not verified; <b>NC</b> - Non-compliant; <b>Ad NC</b> - Administrative non-compliance; <b>NT</b> - Not triggered; <b>Obs</b> - Observation			
Developments described in Clause 2.3 of the Agreement, and maintaining developments (including existing fire trails and infrastructure) are subject to the conditions detailed in Item 1 (v).		Site inspection Discussion - Venue Manager (VM) and OoS Google Earth image dated 01/04/2019 and 07/09/2020	C
A comprehensive, measurable monitoring program including baseline information and data shall be implemented .... to ensure that any existing or potential pollution, sedimentation or contamination impacts from Zone 2 and 3 do not impact upon Zone 1, and if any impacts are detected these shall be remediated immediately.		2019/20 Annual Report (ErSed 2020)	C
Photographs at the identified (and future) photo-points (refer Item 1 (x)) should be taken from time to time in consultation with the Department's officers for the purposes of ongoing monitoring of the conservation values.		CAMBCA Report (Lesryk 2019)	C
The Owner shall complete a monitoring report on an annual basis, including photo-point photos, noting changes occurring in the conservation area. This will form the basis for decisions about ongoing management actions. A copy of all monitoring reports should be forwarded to the Department.		CAMBCA Report (Lesryk 2019)	C

CONSERVATION AGREEMENT (Oct 2010)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>Annexure C - Item 2</b>			
The Owner shall not undertake, consent to, or permit (unless specified in Item1 of Annexure C or with prior written consent of the Director-General), the activities detailed in Item 2 (a) - (j).	<p>Item 2(a) prohibits 'the carrying or firing of firearms in Zones 1 or Zone 2 (in the event that a development consent or approval is obtained from the relevant consent authority for Zone 2, firearms permitted as per approval conditions.)'</p> <p>Consent (with conditions) has been granted for shooting activities in Zone 2.</p> <p>Carrying or firing of firearms in Zones 1 or Zone 2 (other than that permitted) could not be verified however there was no evidence or reason to suggest non-compliance.</p>	<p>Discussion - Venue Manager (VM)</p> <p>Range Rules</p>	NV

Ecological Management Plan (GHD, September 2010)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>4.2 - Permitted Use</b>			
No development to the natural areas outside of the shooting range license areas which are caused by the activities of the ranges.		Site inspection Discussion - Venue Manager (VM) Google Earth image dated 01/04/2019 and 07/09/2020	C
All areas outside of the shooting range precincts will be managed for environmental conservation.	Areas monitored by ecology consultant - no actions external to precincts identified.  Collaborative management with RFS and NPWS / BCT.  More active liaison with / by RFS and NPWS / BCT recommended to ensure effective management.	CAMBCA report (Lesryk 2019)  Consultation with BCT	C
No public vehicle access is permitted in the plan area.	The SHRSC does not permit public vehicle access via the complex, and there is no evidence of actual vehicle access. Observation was made in the CAMBCA report (Lesryk 2019):  <i>'Gate/fence identified as broken enabling vehicle access from the firetrail on the western side of a powerline easement, 1.8 km south of the 800 m rifle range (Zone 1). "The track has a <u>history of use</u> and appears to currently be in use.'</i>  The fence is relatively remote from the Complex and is understood to be repeatedly vandalised to gain access - regulation of such activities is beyond the authority or capabilities of the SHRSC.	Discussion - Venue Manager (VM) Site inspection CAMBCA report (Lesryk 2019)	Obs

Ecological Management Plan (GHD, September 2010)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
Horse-riding is not permitted in the plan area.	The SHRSC does not permit public vehicle access via the complex, and there was no evidence of horse-riding during site inspection, or identified in the CAMBCA report (Lesryk 2019).	CAMBCA report (Lesryk 2019) Site inspection Discussion - Venue Manager (VM)	C
There will be no development of facilities in the plan area.		Site inspection Discussion - Venue Manager (VM) and OoS Google Earth image dated 01/04/2019 and 07/09/2020	C
No bee hive sites will be licensed in the plan area.	SHRSC not responsible for licensing. No evidence or reason to suggest non-compliance.	Site inspection Discussion - Venue Manager (VM)	NV
<b>5.2 - Vegetation Management</b>			
Operational Phase - i.e. ongoing use of the proposed shooting range and managing and monitoring impacts on surrounding SP1 and E2 zones.	Refer OEMP Action E1 to E7. Refer OEMP Section 6.1, 6.4 and 6.7.		
<b>5.3 - Fauna and Habitat Management</b>			
Operational Phase - i.e. ongoing use of the proposed shooting range and managing and monitoring impacts on surrounding SP1 and E2 zones.	R Refer OEMP Action E1 to E7. Refer OEMP Section 6.1, 6.4 and 6.7.		

Ecological Management Plan (GHD, September 2010)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>5.4 - Weed management</b>			
Operational Phase - i.e. ongoing use of the proposed shooting range and managing and monitoring impacts on surrounding SP1 and E2 zones.	Refer OEMP section E3 and E6. Refer OEMP Section 6.1, 6.4 and 6.7.		
<b>5.5 - Biosecurity Management</b>			
Operational Phase - i.e. ongoing use of the proposed shooting range and managing and monitoring impacts on surrounding SP1 and E2 zones.	Refer OEMP Section 6.1, 6.4 and 6.7.		
<b>5.6 - Pest Animal Management</b>			
Operational Phase - i.e. ongoing use of the proposed shooting range and managing and monitoring impacts on surrounding SP1 and E2 zones.	Refer OEMP section E6. Refer OEMP Section 6.1, 6.4 and 6.7.		
<b>5.7 - Bushfire Management</b>			
Operational Phase - i.e. ongoing use of the proposed shooting range and managing and monitoring impacts on surrounding SP1 and E2 zones.	Refer OEMP section B1 to B14. Refer OEMP Section 6.1, 6.4 and 6.7.		
<b>5.8 - Contamination and Off-site Impacts</b>			
Operational Phase - i.e. ongoing use of the proposed shooting range and managing and monitoring impacts on surrounding SP1 and E2 zones.	Refer OEMP Action C1, C2, C3.		

Ecological Management Plan (GHD, September 2010)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>5.9 - Access</b>			
Operational Phase - i.e. ongoing use of the proposed shooting range and managing and monitoring impacts on surrounding SP1 and E2 zones.	Refer OEMP Action E1.		
<b>6.2 - Induction and Training (Operational Phase)</b>	Refer OEMP Section 6.7.		
<b>7.1 - Monitoring and Review (Biodiversity Values)</b>	Refer OEMP Section 6.1, 6.4 and 6.7.		
<b>7.2 - Monitoring and Review (Weed Presence)</b>			
Operational Phase - i.e. ongoing use of the proposed shooting range and managing and monitoring impacts on surrounding SP1 and E2 zones.	Refer OEMP Section 6.1, 6.4 and 6.7.		
<b>7.3 - Monitoring and Review (Phytophthora)</b>			
Phytophthora dieback will be monitored in accordance with the Phytophthora Monitoring Protocol.	Refer OEMP Section 6.1, 6.4 and 6.7.		
<b>7.4 - Monitoring and Review (Feral animals)</b>			
Monitoring of European Rabbit activity will be undertaken within the cleared firing ranges and surrounding areas through periodic searches of the sites.  Any observed increase in activity would trigger the development of a management plan, in conjunction with local National Parks Officers and the Rural Lands Protection Board.	Review OEMP section E6.  Refer OEMP Section 6.1, 6.4 and 6.7.		

Ecological Management Plan (GHD, September 2010)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
<b>C</b> - Compliant; <b>NV</b> - Not verified; <b>NC</b> - Non-compliant; <b>Ad NC</b> - Administrative non-compliance; <b>NT</b> - Not triggered; <b>Obs</b> - Observation			
<p>Feral animal management will form a component of the agreed annual works program to be undertaken by the Parks and Wildlife Group, as outlined in the draft Memorandum of Understanding between the Group and Communities NSW.</p> <p>A report on the annual works and the targets met by the program will be submitted to Communities NSW at the end of each financial year.</p>	Refer OEMP Section 6.7.		
<b>7.5 - Monitoring and Review (Heavy Metal and Chemical Contamination)</b>			
<p>A long-term monitoring program will be implemented at the site to monitor possible metal accumulation and migration from the site in accordance with Section 5 of the Water Cycle Management Plan (GHD 2010b, c).</p>	Refer OEMP Section 6.1, 6.4 and 6.7.		
<p>Chemical storage, disposal and handling procedures will be monitored in conjunction with health and safety audits.</p>	Refer OEMP Section 6.1 and 6.7.		
<b>8.2 - Annual Reporting for Plan Area</b>			
<p>Under the conservation agreement pursuant to the National Parks and Wildlife Act for the site (2010), the land manager of the site (Communities NSW) is required to complete an annual monitoring report for submission to DECCW. Refer Section 8.2. for scope.</p>	Refer OEMP Section 6.7.		

**SPECIAL EVENT MANAGEMENT PLAN (NSW Government Office of Support, September 2019)**

CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
<p><b>C</b> - Compliant; <b>NV</b> - Not verified; <b>NC</b> - Non-compliant; <b>Ad NC</b> - Administrative non-compliance; <b>NT</b> - Not triggered; <b>Obs</b> - Observation</p>			
<p><b>8 - Mitigation measures</b></p>			
<p>Environmental management is controlled in accordance with the SHRSC Operational Environmental Management Plan (OEMP).</p>	<p>Refer OEMP.</p>		
<p>Environmental incidents and non-compliances with environmental licences or development approval conditions are required to be recorded.</p>	<p>Refer OEMP Action E7.</p>		

BUSHFIRE MANAGEMENT PLAN (Building code and Bushfire Hazard Solutions P/L, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>2.2 - Mitigation Activities</b>			
Fire trails and access ways shall be well maintained to accord with the NSW Rural Fire Services documents, "Planning for Bushfire Protection – 2006 and "Fire Trail Standards - 2017".	Refer BMP Appendix G - Item 1		
The structure of vegetation over selected areas shall be altered to reduce the spread of the bushfire and / or fire behaviour.	Refer BMP Appendix G - Item 3		
Combustible materials and fire hazards within designated APZ's areas shall be relocated or removed in accordance with the NSW Rural Fire Services document "Standards for Asset Protection Zones".	Refer BMP Appendix G - Item 2		
Hot Works Permits shall be issued by the SHRSC Manager as necessary to manage ignition risk. Hot work shall be cancelled on days of severe or above fire danger unless critical to infrastructure and only after consultation with the NSW Rural Fire Service has occurred.	No HWP's.  No evidence or reason to suggest non-compliance.	Site inspection  Discussion - Venue Manager (VM)	NV
Fire service water tanks shall be assessed bi-monthly to ensure full tanks, that all fire service connections are operational and necessary repairs be conducted to tanks or roof gutters / down pipes.	Refer BMP Appendix G - Item 5		
Fire hydrants shall be assessed annually to ensure gravity operation and compliance with "Planning for Bushfire".	Refer BMP Appendix G - Item 6		

<b>BUSHFIRE MANAGEMENT PLAN (Building code and Bushfire Hazard Solutions P/L, August 2018)</b>			
<b>CONDITION / REQUIREMENT</b>	<b>COMMENTS</b>	<b>EVIDENCE</b>	<b>COMPLIANCE</b>
<b>C</b> - Compliant; <b>NV</b> - Not verified; <b>NC</b> - Non-compliant; <b>Ad NC</b> - Administrative non-compliance; <b>NT</b> - Not triggered; <b>Obs</b> - Observation			
Bushfire reports shall be prepared for all planned and unplanned fires on the complex by NSW Rural Fire Service / National Parks and Wildlife Service.	Nil planned fires.  2019-20 bushfires inquiry undertaken by State.	Discussion - Venue Manager (VM)  <a href="https://www.nsw.gov.au/nsw-government/projects-and-initiatives/nsw-bushfire-inquiry">https://www.nsw.gov.au/nsw-government/projects-and-initiatives/nsw-bushfire-inquiry</a>	Obs
Inspection of all buildings shall be completed annually to ensure compliance to "AS3959 Construction of buildings in bushfire prone areas".	Refer BMP Appendix G - Item 4		
All ranges shall be mowed / slashed regularly.	Refer BMP Appendix G - Item 4		
<b>5.5 - Environmental Rehabilitation</b>			
Short-term assessment and emergency works for stabilisation or rehabilitation shall be instituted immediately following fire suppression operations.	Nil fire suppression operations within developed area.  Nil advice from RFS re: hazard reduction burn within plan area.  Any burns or stabilisation or rehabilitation beyond limits of developed area could not be verified.	Discussion - Venue Manager (VM)  RFS hazard reduction burn notifications	NV

BUSHFIRE MANAGEMENT PLAN (Building code and Bushfire Hazard Solutions P/L, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
<b>C</b> - Compliant; <b>NV</b> - Not verified; <b>NC</b> - Non-compliant; <b>Ad NC</b> - Administrative non-compliance; <b>NT</b> - Not triggered; <b>Obs</b> - Observation			
Liaison with National Parks and Wildlife Service following a major bushfire incident to identify seriously impacted areas, and where necessary formulate a more detailed recovery plan.	SHRSC was inspected by the NSW Biodiversity Conservation Trust (BCT) following the Dec 2019 / Jan 2020 bushfire during which advice was provided on maintenance and recovery after the fires. The main actions requested pertained to erosion and sediment control (ESC) within the developed area which may impact the recovery of adjacent bushland.  A majority of actions have been implemented with some not completed initially due to availability of the preferred ESC control devices effected by COVID19 supply issues.  The SHRSC has not been requested to participate in any specific recovery plans.	Discussion - Venue Manager (VM)  Site inspection  Consultation with BCT.	C
<b>Appendix F - Bushfire Risk Management Plan</b>			
<b>Section 2.2 - Asset specific treatments</b>			
SHRSC Manager to monitor all maintenance work within the Complex.	VM onsite 3 days per week - no maintenance works outside these times. Demonstrated understanding of maintenance requirements and activities.	Discussion - Venue Manager (VM)  Site inspection	C
SHRSC Manager to restrict or monitor any camping within the Complex.			NT
Close the Complex on Severe and above FDI days.	Daily FDI history unobtainable however, no recorded attendance between 14/12/2019 and 07/02/20 which represents the most severe period of the Dec 2019 / Jan 2020 bushfire.	SHRSC attendance records (April 2019 - April 2020)	C

BUSHFIRE MANAGEMENT PLAN (Building code and Bushfire Hazard Solutions P/L, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
SHRSC Manager to map areas for APZ construction and seek assistance to construct.	Refer BMP Appendix G - Item 2		
SHRSC Manager shall ensure that APZ's are constructed and maintained for the 50m; 500m and 800m firing points, Offices and Club House to a distance of 20m around these assets.	Refer BMP Appendix G - Item 2		
The OoS shall propose areas for SFAZ's in line with the local W/W BFRMP 2017.	Refer BMP Appendix G - Item 3		
The OoS shall consult with the NSW RFS on how to best implement agreed SFAZ's.	Refer BMP Appendix G - Item 3		
SHRSC Manager shall ensure all APZ and SFAZ's are inspected annually.	Refer BMP Appendix G - Item 2		
SHRSC Manager shall ensure all staff are familiar with the Bushfire Section within the complex's Emergency Management Plan.	Training records provided for June 2020 - induction or awareness training for audit period not verified.		NV
SHRSC Manager and the OoS shall review bushfire planning for the Complex.	Refer BMP Appendix F - Section 3.2		
SHRSC Manager shall ensure all access roads, fire trails and any control lines are maintained to NSW RFS standards.	Refer BMP Appendix G - Item 4		

BUSHFIRE MANAGEMENT PLAN (Building code and Bushfire Hazard Solutions P/L, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
<b>C</b> - Compliant; <b>NV</b> - Not verified; <b>NC</b> - Non-compliant; <b>Ad NC</b> - Administrative non-compliance; <b>NT</b> - Not triggered; <b>Obs</b> - Observation			
<b>Section 2.4.1 - Asset Protection Zone</b> (Annual works program)			
The OoS shall prepare an annual works program for its APZ and any future SFAZ areas.	Refer BMP Appendix G - Item 2 & Item 3		
APZ's will be assessed in the winter of each year with a work report being provided before the beginning of the bushfire danger period each year. Where the APZ's no longer comply with the requirements of the "Standards for Asset Protection Zones", work will be undertaken to ensure compliance, preferably in early October.	Refer BMP Appendix G - Item 2		
<b>Section 2.4.2 - Proposed Strategic Fire Advantage Zones</b> (Annual works program)			
The OoS, in consultation with the NP&WL and NSW Rural Fire Service, is responsible for constructing the SFAZ as per Section 2.4.2.	Refer BMP Appendix G - Item 3		
<b>Section 2.4.3 - Access roads and fire trails</b> (Annual works program)			
<p>The OoS will ensure all existing main access roads and trails are compliant with a Category 1 determination under the NSW Rural Fire Services document "Fire Trail Standards - 2017".</p> <p>All other ancillary fire trails will be managed as either Category 1 or Category 7 fire trails.</p>	Refer BMP Appendix G - Item 1		

BUSHFIRE MANAGEMENT PLAN (Building code and Bushfire Hazard Solutions P/L, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
The future shotgun range requires an access trail (Category 1) extending from the entry road near the future club house to the range located approximately half way between the 500m and 800m ranges.			NT
<b>Section 3.1 - Monitoring</b>			
The OoS shall monitor the vegetation regeneration within all APZ's and SFAZ's on an annual basis to coincide with the NSW RFS document "Standards for asset protection zones".  The process will either involve an NSW Rural Fire Service assessment or an assessment report from a suitably qualified bushfire consultant.	Refer BMP Appendix G - Item 2 and Item 3		
A brief report will be provided to the NSW Rural Fire Service outlining the status of the SHRSC for recording and or consultation in regard to regional planning.	RFS committee meetings attended by VM - no invitations or documented minutes of discussion points.	Discussion - Venue Manager (VM)	NV
<b>Section 3.2 - Review</b>			
The OoS will at least every five (5) years cause to have this BFRMP reviewed for accuracy <u>or following a major bush fire either within the SHRSC Complex or adjacent to it</u> for the purposes of ensuring adequate bush fire protection is available primarily to all staff and occupants of the Complex.	The areas were severely affected by the Dec 2019 / Jan 2020 bushfire during the audit period (and remain affected).  Drone footage collected as material for BMP review.  Review of BMP (or associated plans) following Dec 2019 / Jan 2020 bushfires claimed by Venue Management could not be verified due to the absence of any documentation or amendment of the BMP (if required).		NV

BUSHFIRE MANAGEMENT PLAN (Building code and Bushfire Hazard Solutions P/L, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>Appendix G - Bushfire Mitigation Action Plan</b>			
<b>Item 1 - Fire trails and access roads</b>			
<p>Ensure compliance with NSW Rural Fire Service document "Fire Trail Standards" 2017 and BFCC Fire Trail Policy No 2/2007.</p> <p>Works completed by August 2019 - February 2020.</p> <p>Review annually; Winter, or after extensive vehicular use or following extensive heavy rains.</p>	<p>Independent assessment of compliance with standards and codes, and RFS keyed gates, beyond scope of audit.</p> <p>Maintenance completed on access roads, vegetation, and swales / drains.</p>	<p>Discussion - Venue Manager (VM)</p> <p>Site inspection</p> <p>Photo evidence provided by VM</p>	NV

BUSHFIRE MANAGEMENT PLAN (Building code and Bushfire Hazard Solutions P/L, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
<b>C</b> - Compliant; <b>NV</b> - Not verified; <b>NC</b> - Non-compliant; <b>Ad NC</b> - Administrative non-compliance; <b>NT</b> - Not triggered; <b>Obs</b> - Observation			
<b>Item 2 - Asset Protection Zone/s</b>			
<p>Ensure compliance with NSW Rural Fire Services documents; "Planning for Bushfire Protection – 2006" and "Standards for Asset Protection Zones" and RFS Bushfire Environmental Assessment Code 2006.</p> <p>Works completed by August 2019.</p> <p>Review annually; Autumn / Spring.</p>	<p>The BMP identifies a broadscale APZ for the 50 m and 500 m ranges as per the W/W BFRMP 2017 and states the OoS should liaise with the NPWS and RFS to clarify the boundary's so as to ensure ecological compliance and formal APZ set-backs.</p> <p>Pre-season inspection by RFS or consultant not undertaken.</p> <p>Localised APZs for 50 m and 500 m range built structures constructed as part of new ranges. These essentially comprise hardstand with the exception of a small area of vegetation to the north of the 500 m range building. General grounds maintenance addresses APZ maintenance that fall within the developed area however management of the vegetated APZ north of the 500 m range could not be verified due to the effects of the Dec 2019 / Jan 2020 bushfire.</p> <p>Expansion of the APZ at the 800 m range clubhouse has been completed. However provision of firefighting resources and construction of additional fire trails for this location are outstanding.</p> <p>The areas remain effected by the Dec 2019 / Jan 2020 bushfire. Advice should be sought from Wollondilly / Wingecarribee Councils, NPWS, and the RFS with respect to defining and managing APZs as vegetation regenerates.</p>	<p>Discussion - Venue Manager (VM)</p> <p>Site inspection</p> <p>Google Earth image dated 01/04/2019 and 07/09/2020</p>	Obs

BUSHFIRE MANAGEMENT PLAN (Building code and Bushfire Hazard Solutions P/L, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
<p><b>C</b> - Compliant; <b>NV</b> - Not verified; <b>NC</b> - Non-compliant; <b>Ad NC</b> - Administrative non-compliance; <b>NT</b> - Not triggered; <b>Obs</b> - Observation</p>			
<b>Item 3 - Strategic Fire Advantage Zones/s</b>			
<p>Confirm location and any prescribed burn arrangements in accordance with NP&amp;WL regional environmental planning and the local BFRMP.</p> <p>Works completed by August 2020.</p>	<p>The previous GHD BMP (2010-2015) noted that the Complex was both an LMZ and had three SFAZ's in specific locations although these were not recognised by NPWS (as the land was considered privately managed).</p> <p>The areas proposed as SFAZ's within the BMP were (and remain) severely affected by the Dec 2019 / Jan 2020 bushfire. SFAZ are identified as relatively low priority (e.g. compared to APZs) within the BMP, which specifies annual review / action.</p> <p>Advice should be sought from Wollondilly / Wingecarribee Councils, NPWS, and the RFS with respect to defining and managing SFAZ as vegetation regenerates.</p>		NT
<b>Item 4 - Built assets</b>			
<p>Compliance with "AS3959 Construction of buildings in bushfire prone areas".</p> <p>Arrange inspection of all buildings to ensure compliance to AS3959.</p> <p>If required, upgrade existing buildings to comply with AS3959.</p> <p>Ensure all ranges are mowed/ slashed regularly.</p> <p>Works completed by August 2019.</p> <p>Review annually: Autumn / Spring.</p>	<p>Existing permanent buildings inspected annually.</p> <p>Current funding bid for construction of 800 m range control office meeting fire safe standards to replace existing mobile facility (caravan), plus additional firefighting and fire safe facilities.</p>	<p>Site inspection</p> <p>Discussion - Venue Manager (VM)</p> <p>Photo evidence provided by VM.</p> <p>Construction certificate dated 14/05/2019</p> <p>Fire Safety Statements (Dec 2019)</p>	C

BUSHFIRE MANAGEMENT PLAN (Building code and Bushfire Hazard Solutions P/L, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>Item 5 - Fire service water tanks</b>			
<p>Ensure full tanks, all fire service connections are operational, conduct necessary repairs to tanks or roof gutters / down pipes.</p> <p>Works completed by February 2019.</p> <p>Review fortnightly.</p>	<p>Installation of infrastructure verified.</p> <p>Subsequent tank and service connection inspections not recorded.</p>	<p>Site inspection</p> <p>Discussion - Venue Manager (VM)</p> <p>Construction certificate dated 14/05/2019</p>	Obs
<p>Provide new 20,000L Water tank to 800m Firing Range and RFS connections.</p> <p>Works completed by August 2019.</p> <p>Review fortnightly.</p>	<p>Subject to funding - unsuccessful annual funding bids since 2019/20.</p>		Obs
<p>Signpost where all available water sources are and distribute it to NP&amp;WS and NSW Rural Fire Service.</p>	<p>Hydrants and tanks are clearly visible within the site and basin water signed as not suitable.</p> <p>VM in contact with RFS. Site inspection of site / water sources by RFS has occurred however documentation not provided to NPWS and RFS.</p>		Ad NC

<b>BUSHFIRE MANAGEMENT PLAN (Building code and Bushfire Hazard Solutions P/L, August 2018)</b>			
<b>CONDITION / REQUIREMENT</b>	<b>COMMENTS</b>	<b>EVIDENCE</b>	<b>COMPLIANCE</b>
<b>C</b> - Compliant; <b>NV</b> - Not verified; <b>NC</b> - Non-compliant; <b>Ad NC</b> - Administrative non-compliance; <b>NT</b> - Not triggered; <b>Obs</b> - Observation			
<b>Item 6 - Fire hydrants</b>			
<p>Ensure full tanks, all fire service connections are operational, conduct necessary repairs to tanks or roof gutters / down pipes.</p> <p>Ensure 65mm storz adaptors are provided and blank caps fitted.</p> <p>Works completed by August 2019.</p> <p>Review annually.</p>	<p>Installation of infrastructure verified.</p> <p>Subsequent tank and service connection inspections not recorded.</p>		Obs
<b>Item 7 - SHRSC communication system</b>			
<p>Ensure system readiness.</p> <p>Works completed by August 2019.</p>	<p>Regular use 3 days per week.</p>	<p>Site inspection</p> <p>Discussion - Venue Manager (VM)</p> <p>Attendance records</p>	C
<p>Test and inspect system to ensure full working order across all ranges.</p> <p>Review weekly.</p>	<p>As above.</p>		C

BUSHFIRE MANAGEMENT PLAN (Building code and Bushfire Hazard Solutions P/L, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
<b>C</b> - Compliant; <b>NV</b> - Not verified; <b>NC</b> - Non-compliant; <b>Ad NC</b> - Administrative non-compliance; <b>NT</b> - Not triggered; <b>Obs</b> - Observation			
<b>Item 8 - Review</b>			
Bushfire Management Plan and Bushfire Risk Management Plan shall be reviewed every 5 years or after a bushfire incident.  Bushfire Emergency Plan shall be reviewed annually or after an incident.  Ensure current and up to date.	Refer BMP Section 3.2 above.		
EMERGENCY MANAGEMENT PLAN (NSW Government Office of Support, Fire + Rescue, January 2019)			
<b>Bushfire</b>			
Bushfire risk management plan and bushfire mitigation plan documents shall be consulted when planning and responding to bushfire emergencies.	Refer BMP above.		

WATER CYCLE MANAGEMENT PLAN (WCMP) – Operational Phase (ErSed Environmental, August 2018) including SOIL AND WATER MANAGEMENT PLAN (SWMP) – Construction and Operational Phases (ErSed Environmental, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>1.6 WCMP and 1.3 SWMP – Mitigation measures</b>			
Engineering controls shall isolate areas routinely contaminated by bullet strike (primary and secondary impact) from the surrounding catchment.		Construction drawings Site inspection	C
Future remediation of soils shall be completed if monitoring indicates exceedance of relevant contamination assessment criteria based on the land use.	Refer OEMP section C1, C2, C3		
Usage of range firing lanes shall be staggered to minimise impact to stopbutt stability.	Refer OEMP section WQ2		
Surface soils within shot fall zones (primary and secondary impacts) shall be monitored and treated as required to maintain soil pH within the range of 6.5 - 8.5.	Refer OEMP Section 6.1, 6.4 and 6.7		
Grass cover shall be maintained over all areas other than primary impact zones as an erosion control.	Refer OEMP section WQ3		
Fertiliser application and soil ameliorants shall be used where required and regular soil testing shall be used to inform and confirm correct fertiliser application and avoid potential excessive application and offsite impacts.			NT
Where feasible less toxic projectiles (i.e. non lead) shall be used.	Refer OEMP section WQ2		

WATER CYCLE MANAGEMENT PLAN (WCMP) – Operational Phase (ErSed Environmental, August 2018) including SOIL AND WATER MANAGEMENT PLAN (SWMP) – Construction and Operational Phases (ErSed Environmental, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>4.2 Operational Phase (WCMP)</b>			
Surface waters from all areas external to the range shall be diverted or otherwise made to drain away from potentially contaminated areas.		Construction drawings Site inspection	C
Bullet stopbutts shall be positioned behind the targets and bullet traps to collect/contain projectiles to facilitate their recovery and recycling.	Reconstruction of 800 m range stopbutts programmed - range out of use until completed.	Site inspection	C
A layer of crushed limestone shall be located in the base of the stopbutt to reduce capillary rise and contact between low pH water and lead projectiles.	Refer OEMP Action WQ4.		
Seepage shall be directed to lime treatment trenches and pits, where any lead or contaminants would drop out.		Discussion - Venue Manager (VM) Construction drawings Site inspection	C
Within the range fairways, additional lime filled trenches are provided at low points to ensure that any potential overland flow containing lead is intercepted. These trenches shall drain directly to sediment control basins.		Discussion - Venue Manager (VM) Construction drawings Site inspection	C
<b>WCMP 4.2.2 and SWMP 4.1 – Stormwater management</b>			
Stormwater infrastructure in a 'treatment train' approach shall be implemented which provides controls which reduce erosion and sediment transport.		Site inspection	C

WATER CYCLE MANAGEMENT PLAN (WCMP) – Operational Phase (ErSed Environmental, August 2018) including SOIL AND WATER MANAGEMENT PLAN (SWMP) – Construction and Operational Phases (ErSed Environmental, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
Re-grading and flattening out the slope of the land surfaces and creating broad, very shallow drainage pathways to replace ditches or deep, narrow channels shall be completed.		Site inspection	C
Prevention of storm water from impacting on berms or other engineering elements.		Site inspection	C
SHRSC will have six basins, three located at the 500 m / future 200 m range, one each at the future shotgun and 50 m pistol range and one at the future clubhouse.	Five basins in place - i.e. excluding the future shotgun range basin.	Site inspection	C
Construction stage sediment basins to be left in place and shall be utilised for the life of the SHRSC and the water quality monitored as set out in Section 5 – Monitoring Programs.		Site inspection	C
Where possible, captured stormwater is to be disposed of in accordance with WCMP Section 7.3 to maintain vegetation across ranges areas for erosion control.	No evidence or reason to suggest non-compliance.	Discussion - Venue Manager (VM)	NV
Surplus captured stormwater is to be disposed of in accordance with WCMP Section 7.4 if the available range areas become saturated by either rainfall or irrigation.	Nil offsite discharge stated by VM. No evidence or reason to suggest non-compliance.	Discussion - Venue Manager (VM)	NV
Construction of a 3(h):1 (v) slope to improve stability, promote low-velocity sheet flow and assist with vegetation establishment.		Site inspection	C

WATER CYCLE MANAGEMENT PLAN (WCMP) – Operational Phase (ErSed Environmental, August 2018) including SOIL AND WATER MANAGEMENT PLAN (SWMP) – Construction and Operational Phases (ErSed Environmental, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
Usage of range firing lanes shall be staggered to minimise impact to stopbutt stability.	Refer OEMP section WQ2		
Grass shall be maintained over the ranges and stopbutts for erosion control.	Refer OEMP section WQ3		
Stopbutt maintenance between lead recovery and recycling operations shall involve: <ul style="list-style-type: none"> <li>- Replacement of eroded areas, reseeded bare areas, maintaining vegetation.</li> <li>- Placement of temporary erosion controls measures as required to promote stabilisation.</li> </ul>	Maintenance of 800 m range completed.	Discussion - Venue Manager (VM) Photo evidence provided by VM	C
The stopbutt shall be routinely inspected and filling shall be undertaken to repair areas of concentrated impact points.	Refer OEMP Section 6.1, 6.4 and 6.7.		
<b>WCMP 4.2.3 and SWMP 4.2 – Post Development Runoff</b>			
Sedimentation basins shall remain following the construction phase.	Refer WCMP 4.2.2 and SWMP 4.1		
Roof water shall be captured in rainwater tanks for general use around site.		Site inspection	C
<b>WCMP 4.2.4 and SWMP 4.3 – Wastewater Management System</b>			
Portable toilets shall be brought to site for the duration of the construction period and removed from site at the end of the construction period.			C

WATER CYCLE MANAGEMENT PLAN (WCMP) – Operational Phase (ErSed Environmental, August 2018) including SOIL AND WATER MANAGEMENT PLAN (SWMP) – Construction and Operational Phases (ErSed Environmental, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
An Ecomax Septic System or equivalent to be at all locations where wastewater is generated.	Refer OEMP section WQ4.		
A total land disposal area of 387.04 m <sup>2</sup> is required to dispose a maximum 3,300 L / day and provides a zero overflow.	Please identify / mark-up extents of irrigation area / soil mound on plan, plus photos.	Site inspection Discussion - Venue Manager (VM)	C
<b>WCMP 4.2.7 Herbicide Use</b>			
Herbicides shall be used where required to control weeds at the SHRSC in accordance with the Conservation Agreement – Hill Top Conservation Area and the SHRSC Weed Management Plan.	Refer Conservation Agreement Annexure C - Item 1.		
All weed control activities shall be undertaken by qualified bush regenerators using site-specific, best practice bushland restoration measures.	Refer Conservation Agreement Annexure C - Item 1.		
Where effective, weed control measures not requiring herbicides shall be used to control weeds. These include hand removal and regular slashing of range areas to suppress and exhaust undesirable species.	Refer Conservation Agreement Annexure C - Item 1.		
<b>WCMP 4.3 Re-use of Basin Waters</b>			
The existing sedimentation/water quality basins capture stormwater runoff and shall be utilised for the life of the SHRSC in accordance with best practice.	Refer OEMP Section 6.1, 6.4 and 6.7.		

WATER CYCLE MANAGEMENT PLAN (WCMP) – Operational Phase (ErSed Environmental, August 2018) including SOIL AND WATER MANAGEMENT PLAN (SWMP) – Construction and Operational Phases (ErSed Environmental, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
The existing sedimentation/water quality basins shall be managed to maximise reuse of water and minimise discharges of water during construction/establishment and operational phases of the SHRSC.	Refer OEMP Section 6.1, 6.4 and 6.7.		
To maintain native vegetation cover across the site ongoing landscape maintenance is required. Watering exercises will be predominately during the warmer months and the watering frequency shall be adjusted to accommodate recent rainfall events.	No evidence or reason to suggest non-compliance.		NV
Functions of on range operational controls will be monitored and confirmed per the SHRSC Monitoring program and outside this monitoring program, water shall be tested for pH and Turbidity only prior to release through the trickle line.	Refer OEMP Section 6.1, 6.4 and 6.7.		
<b>WCMP 4.2.5 and SWMP 4.5 – Application of Soil Amendments</b>			
Fine agricultural grade lime shall be applied to soils within the range, shot fall zones, stopbutts and collection trenches to reduce the mobility of metals by increasing soil pH to within the range of 6.5 to 8.5.	Refer OEMP Action WQ4. Refer OEMP Section 6.1, 6.4 and 6.7.		

WATER CYCLE MANAGEMENT PLAN (WCMP) – Operational Phase (ErSed Environmental, August 2018) including SOIL AND WATER MANAGEMENT PLAN (SWMP) – Construction and Operational Phases (ErSed Environmental, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>WCMP 4.2.6 and SWMP 4.6 – Projectile Clean-Up and Contaminated Soil Remediation</b>			
Projectiles shall be regularly recovered and recycled from fall zones and stopbutts through raking, sifting and screening methods.	<p>Shooting activity during the audit period was estimated to be ~ 25 % of complex capacity.</p> <p>Inspection by VM has not identified projectile accumulation and the stopbutt design provides for disintegration of projectiles.</p> <p>Monitoring records do not indicate water quality impacts or excessive soil impacts from lead build-up.</p> <p>The triggers and methods for projectile recovery should be reviewed.</p>	<p>Site inspection</p> <p>Discussion - Venue Manager (VM)</p> <p>SHRSC attendance records (April 2019 - April 2020)</p> <p>Annual Report (ErSed 2020)</p>	NT
<p>The removal of projectiles from the stopbutts shall be focused primarily around the bullet pocket/toe of the berm.</p> <p>Inspections of the complex and buffer zones is undertaken annually to identify any additional zones that may require clean-up.</p>	As above.	As above.	NT
The regularity of projectile recovery is dependent upon the level of activity at the shooting complex (OoS keep records of the number of projectiles fired), but as a minimum shall be undertaken annually.	Refer OEMP Section 6.1 and 6.7.		
Inspections of the complex and buffer zones shall be undertaken annually to identify any additional zones that may require clean-up.	Refer OEMP Section 6.1, 6.4 and 6.7.		

WATER CYCLE MANAGEMENT PLAN (WCMP) – Operational Phase (ErSed Environmental, August 2018) including SOIL AND WATER MANAGEMENT PLAN (SWMP) – Construction and Operational Phases (ErSed Environmental, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
The quantity of projectiles recovered from the complex shall be compared with firing records to monitor the effectiveness of range operational and engineering controls.	As above. Firing records maintained.		NT
The collected projectiles shall be held in appropriately labelled covered storage containers and shall be stored on site for no longer than one month before being moved to a licensed recycling facility.	As above.		NT
Soil testing and monitoring is undertaken in accordance with the monitoring program.	Refer OEMP Section 6.1, 6.4 and 6.7.		
<b>5.4 Programs (WCMP)</b>			
Soil sampling shall be undertaken by persons experienced in the collection of samples as per Table 3 WCMP.	Refer OEMP Section 6.1.		
Sediment sampling shall be undertaken by persons experienced in the collection of samples as per Table 4 WCMP.	Refer OEMP Section 6.1.		
Surface water sampling shall be undertaken by persons experienced in the collection of samples as per Table 5 WCMP.	Refer OEMP Section 6.1.		
Visual inspections shall be undertaken by persons experienced in erosion control and with knowledge of the function of the controls as per table 6 WCMP.	Refer OEMP Section 6.1.		

WATER CYCLE MANAGEMENT PLAN (WCMP) – Operational Phase (ErSed Environmental, August 2018) including SOIL AND WATER MANAGEMENT PLAN (SWMP) – Construction and Operational Phases (ErSed Environmental, August 2018)			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>4.4 Permanent Erosion Control (SWMP)</b>			
Construction of a 3(h):1(v) slope to improve stability, promote low-velocity sheet flow and assist with vegetation establishment.	Yes, as per NSW Police Range Guidelines	Site inspection	C
Usage of range firing lanes shall be staggered to minimise impact to stopbutt stability,	Refer OEMP section WQ2.		
Grass shall be maintained over the ranges and stopbutts for erosion control.	Refer OEMP section WQ3.		
Construction stage sediment basins to be left in place and shall be utilised for the life of the SHRSC and the water quality monitored as set out in Section 5 – Monitoring Programs.	Refer OEMP Section 6.1, 6.4 and 6.7.		
<b>5.1 Operational Phase Monitoring (SWMP)</b>			
Visual inspections shall be carried out six monthly and after any severe storm event at: <ul style="list-style-type: none"> <li>- water quality basin outlets, inlets and surrounds</li> <li>- engineering controls including berms, drains, channels, stopbutts, access tracks and culverts.</li> </ul>			NT
Visual inspections shall be carried out annually of the range perimeter.	Refer OEMP Section 6.1 and 6.7.		
Visual inspections shall be carried out fortnightly during vegetation period of the vegetation health.	Refer OEMP Section 6.1 and 6.7.		

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>Contamination (C1, C2, C3)</b>			
If monitoring indicates exceedance of relevant contamination criteria, remediation of soils shall be undertaken.	Investigation of potential treatment of the 50m intermediate mound at the 500m range to correct observed low pH (assume pH~5.5) was recommended following quarterly monitoring conducted 23rd March 2020.  Placement of ground limestone was suggested as a longer term solution subject to involvement by the range manager.	2019/20 Annual Report (ErSed 2020)	Obs
Usage of firing lanes at the ranges shall be staggered to minimise impacts on stop butt stability.	Refer OEMP Action WQ2		
Grass shall be established where possible as an erosion control and to assist with filtering pollutants from runoff.	Refer OEMP Action WQ3		
Fine agricultural grade lime shall be raked into soils within the range, shot fall zones, and stop butts to reduce the mobility of metals by increasing soil pH to within the range of 6.5 to 8.5.	Refer OEMP Action WQ4.		
Soil around stop butts shall be tested for chemical characteristics to confirm maximum quantity of phosphate application in stop butt trenches.	Refer OEMP Action WQ2.		
Monitor pH and phosphate levels where lime and phosphate are added to soils.	Refer OEMP Action WQ2.		

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
Lime shall be re-applied when the pH of soils is found to drop below pH 6.5.	Refer OEMP Action WQ4.		
To prevent metal migrations at the shooting range, shot fall zones are to be overlapped to minimise the area of potential impact.	Integrated within design to extent practicable.	Design drawings Discussion - Venue Manager (VM)	C
Where feasible the use of less toxic shot (i.e. nonlead) shall be promoted by the clubs.	Refer OEMP Action WQ2.		
A long-term monitoring program shall be implemented at the site to monitor possible metal accumulation and migration from the site.	Refer OEMP Action WQ2.		
<b>Waste (W1)</b>			
Waste shall be managed to the principles embodied in the Waste Avoidance and Resource Recovery Act 2001 and include avoidance; reuse and disposal as a last resort.	Waste / recycling receptacles onsite. Contractor - Veolia.  Brass (shells) recovered by shooters and reused and/or deposited in recycling receptacle onsite.	Site inspection  Discussion - Venue Manager (VM)  Invoice	C

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>Waste (W2)</b>			
Wastes (left over putrescible waste, drinking cartons and food scraps from range users) generated shall be classified in accordance with the NSW EPA (1999) Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-liquid Wastes.	Waste / recycling receptacles onsite. Contractor - Veolia.	Site inspection Discussion - Venue Manager (VM) Invoice	C
Waste (excess and leftover spent shot, spent cartridges, clay pigeon fragments and target paper) shall be managed to the principles embodied in the Waste Avoidance and Resource Recovery Act 2001 and include avoidance; reuse and disposal as a last resort.	No wads or clay targets used.  Brass (shells) recovered by shooters and reused and/or deposited in recycling receptacle onsite.	Site inspection Discussion - Venue Manager (VM) Invoice	C
<b>Noise (N1)</b>			
Noise Monitoring shall be undertaken in different climatic conditions to confirm allowable operational usage in accordance with the EPA's Target Shooting Ranges: application Note for Assessing Noise Compliance (EPA, 2015).	Noise monitoring results available at website: <a href="https://www.sport.nsw.gov.au/shootingcentre/SHRSC/compliance">https://www.sport.nsw.gov.au/shootingcentre/SHRSC/compliance</a>  Seasonal conditions captured by quarterly monitoring for first year of operation.  Annual monitoring should be conducted at different times each year if climatic change is to be captured by future monitoring.	Noise monitoring reports - Wilkinson Murray (April, August, November 2019 and Feb 2020).	C

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>Noise (N2)</b>			
The noise from firearms or use of the site must not exceed LZpeak 75 dB at the following locations:  a) at the south-western end of Rocky Waterholes Road, Hill Top (representing the existing residences at 1, 2 and 4 Rocky Waterholes Road)  b) at Nattai Road, Hill Top, adjacent to the western entrance to Wattle Ridge Farm (representing the existing residence).	Initially three locations now reduced to these two.  Noise monitoring results available at website:  <a href="https://www.sport.nsw.gov.au/shootingcentre/SHRSC/compliance">https://www.sport.nsw.gov.au/shootingcentre/SHRSC/compliance</a>	Noise monitoring reports - Wilkinson Murray (April, August, November 2019 and Feb 2020).	C
<b>Noise (N3)</b>			
Noise monitoring shall be undertaken annually to confirm compliance with the EPA's Target Shooting Ranges: Application Note for Assessing Noise Compliance (EPA, 2015)	Noise monitoring results available at website:  <a href="https://www.sport.nsw.gov.au/shootingcentre/SHRSC/compliance">https://www.sport.nsw.gov.au/shootingcentre/SHRSC/compliance</a>	Noise monitoring reports - Wilkinson Murray (April, August, November 2019 and Feb 2020).	C
<b>Noise (N4)</b>			
The noise impacts, including traffic noise, of any proposal to increase site usage shall be subject to detailed investigation. This would involve noise measurements, at the nearest sensitive receivers, of all firearms (recreational and military) used and fired in their respective ranges.	Refer to proposed change in operation hours - Section 3.4 of audit report.		

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>Noise (N5)</b>			
<p>Additional measures may need to be implemented based on measurement results, such as:</p> <ul style="list-style-type: none"> <li>- Altering the acoustic design at the ranges</li> <li>- Restriction of firearms used on the site</li> <li>- Restriction of the use of certain firearms to specific ranges.</li> </ul>	Bund wall constructed opportunistically to the south - not triggered by noise monitoring / impacts.	<p>Site inspection</p> <p>Discussion - Venue Manager (VM)</p>	NT
<b>Noise (N6)</b>			
<p>Attended noise monitoring shall be undertaken quarterly in the first twelve months of operations (aligned with each season) and annually thereafter to confirm noise levels from firearms measured at the locations specified in Condition A9 comply with appropriate limits.</p>	<p>Noise monitoring results available at website:</p> <p><a href="https://www.sport.nsw.gov.au/shootingcentre/SHRSC/compliance">https://www.sport.nsw.gov.au/shootingcentre/SHRSC/compliance</a></p>	Noise monitoring reports - Wilkinson Murray (April, August, November 2019 and Feb 2020).	C
<p>The monitoring must include that of the known noisiest firearms being used on the range and be undertaken in accordance with the EPA's Target Shooting Ranges: Application Note for Assessing Noise Compliance (2015).</p>	<p>Noise monitoring results available at website:</p> <p><a href="https://www.sport.nsw.gov.au/shootingcentre/SHRSC/compliance">https://www.sport.nsw.gov.au/shootingcentre/SHRSC/compliance</a></p> <p>Inclusive of 308 calibre firearms.</p>	Noise monitoring reports - Wilkinson Murray (April, August, November 2019 and Feb 2020).	C

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>Noise (N7)</b>			
New firearms with a potential to be louder than existing firearms used and proposed to be used on site shall be monitored to ensure it does not affect the allowable maximum site usage.	Licensed for all firearms, however no new firearms used other than those captured in monitoring events.  No evidence or reason to suggest non-compliance.	Discussion - Venue Manager (VM)	NV
<b>Bushfire (B1)</b>			
Appropriate fire extinguishers must be located at the control point for each range	Refer OEMP Action B5.		
Regular fire prevention inspections by the Wingecarribee Rural Fire Service shall be undertaken and any recommendations implemented.	Refer BMP Appendix G - Item 2.		
<b>Bushfire (B2)</b>			
Paper/cardboard/rags/etc. waste receptacles shall be regularly emptied.	Day-to-day servicing of waste receptacles cannot be validated.  Commercial bins serviced by waste contractor.  No evidence or reason to suggest non-compliance.		NV
Ensure there are no areas containing large amounts of dry vegetative fuel (such as leaves, felled trees or shrubs, tall dry grass) adjacent to any work areas of the ranges.	Refer OEMP Action B4.		

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
Ongoing vegetation management as per Section 5.2 and Section 5.7 of the Ecological Management Plan (GHD, 2010) shall be implemented.	Weed management and ESC ongoing.	Site inspection Discussion - Venue Manager (VM) 2019 /20 Annual Report (ErSed 2020) CAMBCA report (Lesryk 2019)	C
The management of the hazards remaining on the ranges shall be by means of a Conservation Agreement with the OEH.			NT
<b>Bushfire (B4)</b>			
Appropriate fire extinguishers shall be located at the control point for each range.	Refer OEMP Action B5.		
Ensure there are no areas containing large amounts of dry vegetative fuel (such as leaves, felled trees or shrubs, tall dry grass) adjacent to any work areas of the ranges.	Site effected by Dec 2019 / Jan 2020 bushfire during inspection.  No evidence or reason to suggest non-compliance.	Site inspection Discussion - Venue Manager (VM)	NV
<b>Bushfire (B5)</b>			
Smoking shall only be permitted in designated areas where appropriate disposal units are provided.	Shooting rules do not allow smoking on the line.  Signage in place. Receptacles available.	Site inspection	C
Appropriate fire extinguishers located at the control point for each range.		Site inspection Fire Safety Statement (Dec 2019)	C

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>Bushfire (B6)</b>			
Designated car parks shall be utilised by the users of the ranges to park in.	Designated car parks in use. No evidence or reason to suggest non-compliance.	Site inspection Discussion - Venue Manager (VM)	C
Parking in long grass shall be avoided for maintenance activities.	Only parking in designated areas otherwise overflow area near range entrance used.		C
Ongoing maintenance of all vehicles used on site shall be completed to minimise spark ignition from exhaust systems.	Only diesel vehicles used on range by Complex personnel, no other ignition sources.		C
<b>Bushfire (B7)</b>			
All Hazardous Chemicals and Dangerous Goods (if stored on-site) must be kept in secure storage facilities according to the regulations and designation of the Safety Data Sheet (SDS) requirements.	Combustible liquid only, stored on spill tray. No DG. Stored in secure shed.	Site inspection Discussion - Venue Manager (VM)	C
<b>Bushfire (B8)</b>			
Liaison with emergency services, site familiarisation tours, and workshops including carrying out contingency plan.	RFS committee meetings attended by VM - no documented minutes. No evidence or reason to suggest non-compliance. Fire extinguisher training records post-date audit period.	Discussion - Venue Manager (VM)	NV
<b>Bushfire (B9)</b>			
Site plan must be clearly displayed with relevant contact details and mitigation information.		Observed during site inspection.	C

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>Bushfire (B10)</b>			
Effective liaison shall be established with emergency services.	Refer OEMP Action B11.		
Site personnel to check Rural Fire Service website (www.rfs.nsw.gov.au) at least twice daily during the fire season (October 1st - March 31st).	Refer OEMP Action B11.		
<b>Bushfire (B11)</b>			
Effective liaison shall be established with emergency services.	RFS committee meetings attended by VM - no documented minutes.  No evidence or reason to suggest non-compliance.	Discussion - Venue Manager (VM)	NV
Site personnel to check Rural Fire Service website www.rfs.nsw.gov.au) at least twice daily during the fire season (October 1st - March 31st).	Yes, and also check following day at 4pm.  No evidence or reason to suggest non-compliance.	Discussion - Venue Manager (VM)	NV
<b>Bushfire (B12)</b>			
The asset protection zone shall be managed in accordance with Standards for Asset Protection Zones (NSW RFS 2005).	Refer BMP Appendix G - Item 2.		
<b>Bushfire (B13)</b>			
All revegetation is to be in accordance with asset protection zone specifications.			NT

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>Bushfire (B14)</b>			
Liaison shall be undertaken with the NSW Rural Fire Service Volunteer Bushfire Brigade and with NPWS staff working in the Wingecarribee LGA.  Consultation with these organisations shall cover advice of sources and their mitigation, public education with respect to bushfires in the area and potential for site management.	RFS committee meetings attended by VM - no documented minutes.  No evidence or reason to suggest non-compliance.  Liaison with BCT post Dec 2019 / Jan 2020 bushfires.	Discussion - Venue Manager (VM)	NV
<b>Ecology (E1)</b>			
Access to surrounding bushland shall be restricted to existing bushwalking tracks.	No bushwalking tracks onsite accessible from the Complex.	Discussion - Venue Manager (VM)	NT
Block off / restrict access to tracks through surrounding bushland by installing bollards/ large rocks and boulders (obstacles). Rehabilitate unused/unwanted tracks via natural regeneration method, supplement with plantings if required.			NT
Installation of signs at access points restricting off-road access and clearly demarcating walking trails, signage stating 'stay on marked trails' (or similar).			NT
No new access tracks will be created except for emergency fire management. Internal roads will be maintained to ensure all-weather access for 4WD vehicles.	No new access tracks. Maintenance completed post-bushfire. Internal roads in good order during inspection - no requirement for maintenance identified in routine quarterly inspections (ErSed 2020).	Site inspection  Discussion - Venue Manager (VM)  2019/20 Annual Report (ErSed 2020)	C

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
Management of illegal vehicle access considerations will be undertaken jointly with the NSW Police and the NPWS, OEH.	<p>The 3rd Quarter (March 2020) visual inspection detailed in the annual report (ErSed 2020) identified potential vehicle access due to fence / gate damage on the fire trail 1.8 km south of the 800 m rifle range (Zone 1).</p> <p>The fence is relatively remote from the Complex and is understood to be repeatedly vandalised to gain access - regulation of such activities is beyond the authority or capabilities of the SHRSC.</p>	2019/20 Annual Report (ErSed 2020)	NT
<b>Ecology (E2)</b>			
Implementation of threatened flora management procedure (Appendix E of the Ecology Management Plan GHD, 2010).	<p>Induction given to all maintenance staff to identify all native and non-native (invasive) flora and fauna.</p> <p>No known incidence of threatened species identification by staff.</p> <p>No evidence or reason to suggest non-compliance.</p>		NV
Induction and species ID cards shall be provided to all maintenance staff likely to encounter threatened flora (e.g. road maintenance staff, bush regenerators, gardeners, landscapers).	<p>Induction given to all maintenance staff to identify all native and non-native (invasive) flora and fauna.</p> <p>ID cards not available onsite.</p>	<p>Discussion - Venue Manager (VM)</p> <p>CAMBCA report (Lesryk 2019)</p>	NC
<b>Ecology (E3)</b>			
Implement Weed Management Strategy (Appendix E of the Ecology Management Plan GHD, 2010).		Evidence - e.g. contract / scope of works, invoices / proof of payment?	C

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
Block off/ restrict access to unnecessary tracks through surrounding bushland by installing bollards/ large rocks and boulders (obstacles).	Refer OEMP Action E1.		
No horse-riding permitted in the Complex.	Refer Annexure C – Item 1.		
<b>Ecology (E4)</b>			
Fire management shall be in accordance with the Bushfire Management Plan for the Plan area (GHD, 2011).	Refer BMP section.		
<b>Ecology (E5)</b>			
Regular photos shall be taken at identified and future post development photo points for the purposes of ongoing monitoring of conservation values in accordance with Item 1 y) of the Conservation Agreement (see Section 7.1; Appendix B of the Ecology Management Plan GHD, 2010).	Lesryk monitored six flora plots and six photo-point locations within the SHRSC as well as invasive flora and fauna.	CAMBCA report (Lesryk 2019)	C
<b>Ecology (E6)</b>			
Weed management measures to consider the following: <ul style="list-style-type: none"> <li>- Control of noxious weeds; and</li> <li>- Reduction of edge effects and invasion of exotic species into adjacent vegetation.</li> </ul>	No edge effect impacts identified in CAMBCA report (Lesryk 2019).  Weed management undertaken by contractor.	Site inspection  Discussion - Venue Manager (VM)  CAMBCA report (Lesryk 2019)  Invoices	C

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
Monitoring of the European Rabbit activity within the cleared firing ranges through periodic searches of the ranges shall be carried out, noting the presence of this pest species through grazing, burrowing or pellets. Any observed increase in activity would trigger a management plan to prevent the further spread of this species.	None identified in CAMBCA report (Lesryk 2019), or by Complex staff.	CAMBCA report (Lesryk 2019) Discussion - Venue Manager (VM)	C
<b>Ecology (E7)</b>			
Sediment control measures such as silt fences installed during construction phase should be retained until cleared areas are sufficiently revegetated.	Observed on 50m range and rear of 500m range.	Site inspection Discussion - Venue Manager (VM)	C
All swale drains are to be sufficiently revegetated to infiltrate collected surface runoff from all impervious and developed areas.		Site inspection Discussion - Venue Manager (VM)	C
Stop butts and target mounds would be designed to reduce erosion, including the construction of a 2:1 slope to improve stability, to promote low-velocity sheet flow, and to assist with vegetation establishment. <i>It should be noted, the angle of the forward slope is specified by NSW Police range guidelines as being constructed to at least 30° but ideally 35° in relation to the range fairway.</i>	Refer OEMP Action WQ1.		
The clearance of vegetation shall be minimised and the maintenance of stop butts to be promptly revegetated.	Impacted by bushfire. Reconstruction of 800 m stopbutts not commenced.	Site inspection Discussion - Venue Manager (VM)	NT

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
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C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
All incidents and near misses to be reported as per the Incident Report Form.	Only environmental incident was 2019/20 bushfire which was managed at State level.		NT
The usage of firing lanes at rifle and pistol ranges shall be staggered to minimise on stop butt stability.	Refer OEMP Action WQ2.		
Grass shall be established where possible as an erosion control and to assist with filtering pollutants from runoff.	Refer OEMP Action WQ3.		
Fine agricultural grade lime shall be raked into soils within the range, shot fall zones, and stop butts to reduce the mobility of metals by increasing soil pH to within the range of 6.5 to 8.5.	Refer OEMP Action WQ4.		
Testing to identify the chemical characteristics of soil around stop butts shall be carried out to confirm maximum quantity of phosphate application in stop butt trenches.	Refer OEMP Action WQ2.		
Based on soil testing results, phosphate is to be added to soils in a trench around the stop butts to further immobilise metals.	Refer OEMP Action WQ2.		
Monitoring for pH and phosphate levels shall be carried out where lime and phosphate are added to soils.	Refer OEMP Action WQ2.		
Lime shall be re-applied when the pH of soils is found to drop below pH 6.5.	Refer OEMP Action WQ4.		
Lead management measures to prevent metal migrations at the shooting range shall entail overlapping of shot fall zones to minimise the area of potential impact.	Refer OEMP Action WQ2.		

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
Where feasible the use of less toxic shot (i.e. nonlead) shall be promoted by the clubs.	Refer OEMP Action WQ2.		
A long term monitoring program shall be implemented at the site to monitor possible metal accumulation and migration from the site. The monitoring program is outlined in Section 8.1.	Refer OEMP Action WQ2.		
<b>Water quality (WQ1)</b>			
Sediment control ponds shall be established at the commencement of construction and would be retained for operation of the proposal.		Site inspection Discussion - Venue Manager (VM)	C
Stop butts and target mounds would be designed to reduce erosion, including the construction of a 2:1 slope to improve stability, to promote low-velocity sheet flow, and to assist with vegetation establishment. <i>It should be noted, the angle of the forward slope is specified by NSW Police range guidelines as being constructed to at least 30° but ideally 35° in relation to the range fairway.</i>	Maintained at 3:1 as per NSW Police range guidelines.	Site inspection Discussion - Venue Manager (VM)	C
The stop butt shall be designed to minimise contact between water and Projectiles to reduce the rate of shot deterioration and metal leaching.	Stop butts constructed with gravels overlying geofabric, then sandstone subgrade for drainage prior to preferentially discharging to sed ponds. Sleepers placed at the top to prevent surface erosion from the projectile catchment area.	Site inspection Discussion - Venue Manager (VM)	C

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>Water quality (WQ2)</b>			
The usage of firing lanes at rifle and pistol ranges shall be staggered to minimise impact on stop butt stability.	Move on different days, staggered to shoot at different targets frequently so same lanes distance not frequently used.	Site inspection Discussion - Venue Manager (VM) Photo evidence provided by VM	C
Grass shall be established where possible as an erosion control and to assist with filtering pollutants from runoff.	Refer OEMP Action WQ3.		
Fine agricultural grade lime shall be raked into soils within the range, shot fall zones, and stop butts to reduce the mobility of metals by increasing soil pH to within the range of 6.5 to 8.5.	Refer OEMP Action WQ4.		
Testing to identify the chemical characteristics of soil around stop butts shall be carried out to confirm maximum quantity of phosphate application in stop butt trenches.	Monitoring undertaken. Lime used as alternative to phosphate.	2019/20 Annual Report (ErSed 2020)	C
Based on soil testing results, phosphate is to be added to soils in a trench around the stop butts to further immobilise metals.	Monitoring undertaken. Lime used as alternative to phosphate.	2019/20 Annual Report (ErSed 2020)	C
Monitoring for pH and phosphate levels shall be carried out where lime and phosphate are added to soils.	Monitoring undertaken. Lime used as alternative to phosphate.	2019/20 Annual Report (ErSed 2020)	C
Lime shall be re-applied when the pH of soils is found to drop below pH 6.5.	Refer OEMP Action WQ4.		

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
Lead management measures to prevent metal migrations at the shooting range shall entail overlapping of shot fall zones to minimise the area of potential impact.	Integrated within range design to extent practicable.	Construction drawings Discussion - Venue Manager (VM)	C
Where feasible the use of less toxic shot (i.e. non-lead) shall be promoted by the clubs.	No alternative for pistols. Rifles use non-lead rounds.  No evidence or reason to suggest non-compliance.	Discussion - Venue Manager (VM)	NV
A long term monitoring program shall be implemented at the site to monitor possible metal accumulation and migration from the site. The monitoring program is outlined in Section 8.1.	Monitoring undertaken on quarterly basis.	2019/20 Annual Report (ErSed 2020)	C
<b>Water quality (WQ3)</b>			
Grass shall be established where possible as an erosion control and to assist with filtering pollutants from runoff.		Site inspection	C
<b>Water quality (WQ4)</b>			
The SHRSC will have an Ecomax Septic System or equivalent, designed in accordance with AS/NZS 1547:2012.	Yes, one each range.	Site inspection	C
The design wastewater flow allowance for restroom facilities (toilets and hand basins only) is 15 L/equivalent population (EP) / day (roof water supply), and has been designed based on an expected maximum occupancy of 220 EP.	Attendance numbers do not indicate likely exceedance of wastewater system capacity during standard operations, however the capacity of the existing system (and need for supplementary / alternative wastewater management) must be considered for special events where attendance numbers are likely to exceed the design capacity.		Obs

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
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<b>C</b> - Compliant; <b>NV</b> - Not verified; <b>NC</b> - Non-compliant; <b>Ad NC</b> - Administrative non-compliance; <b>NT</b> - Not triggered; <b>Obs</b> - Observation			
500 metre range: <ul style="list-style-type: none"> <li>- is located 138 metres from Sediment Basin 3</li> <li>- surrounded on three sides by a 0.5m high earth bund separating it from local surface falls</li> <li>- located 225 metres from various ephemeral drainage lines and tributaries within the dense bushland and 1.75 kilometres from Rocky Waterholes Creek.</li> </ul>		Site inspection	C
50 metre range: <ul style="list-style-type: none"> <li>- Is located 42.5 metres from Sediment Basin 5</li> <li>- surrounded on three sides by a 0.5m high earth bund separating it from local surface falls.</li> <li>- located 2955 metres from various ephemeral drainage lines and tributaries within the dense bushland and 1.87 kilometres from Rocky Waterholes Creek.</li> </ul>		Site inspection	C

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
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<p><b>C</b> - Compliant; <b>NV</b> - Not verified; <b>NC</b> - Non-compliant; <b>Ad NC</b> - Administrative non-compliance; <b>NT</b> - Not triggered; <b>Obs</b> - Observation</p>			
<p>Fine agricultural grade lime shall be applied to soils within the range, shot fall zones, stopbutts and collection trenches to reduce the mobility of metals by increasing soil pH to within the range of 6.5 to 8.5.</p>	<p>Lime generally added regularly regardless of monitoring results.</p> <p>Investigation of potential treatment of the 50m intermediate mound at the 500m range to correct observed low pH (assume pH~5.5) was recommended following quarterly monitoring conducted 23/03/2020.</p> <p>Placement of ground limestone was suggested as a longer term solution subject to involvement by the range manager.</p> <p>The above should be considered for inclusion in the bushfire reconstruction works.</p>	<p>Discussion - Venue Manager (VM) 2019/20 Annual Report (ErSed 2020)</p>	<p>C</p>
<p>The dose of lime required shall be determined by laboratory testing and specifications provided for individual lime products.</p>	<p>Laboratory testing undertaken - verbal recommendations from consultant.</p> <p>The annual report does not provide advice on specific liming rates.</p>	<p>Discussion - Venue Manager (VM) Annual Report (ErSed 2020)</p>	<p>NV</p>
<p>Lime shall be re-applied when the pH of soils is found to drop below pH 6.5.</p>	<p>Laboratory testing undertaken - verbal recommendations from consultant.</p> <p>Lime regularly applied irrespective of analytical data, and as recommended by consultant following review of results.</p>	<p>Discussion - Venue Manager (VM)</p>	<p>NV</p>

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
CONDITION / REQUIREMENT	COMMENTS	EVIDENCE	COMPLIANCE
C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>Section 6.1 - Environmental Monitoring</b>			
A monitoring program shall be implemented to monitor possible metal accumulation and migration from the ranges. The monitoring program includes: <ul style="list-style-type: none"> <li>- Soil monitoring – See Table 6-3</li> <li>- Sediment monitoring – See Table 6-4</li> <li>- Surface water monitoring – See Table 6-5</li> <li>- Inspection of shot curtain, stop butts, shot fall zones and erosion control structures – Table 6-6</li> <li>- Inspection of vegetation health and density – Table 6-2.</li> </ul>	Sampling, Analysis and Quality Plan and implementation as per Section 6.1 detailed in 2019/20 Annual Report (ErSed 2020).	2019/20 Annual Report (ErSed 2020)	C
All proposed environmental monitoring and reporting of soils, sediments and water will be undertaken by a suitably qualified person(s).	Completed by ErSed. Report prepared by suitably qualified person.	2019/20 Annual Report (ErSed 2020)	C
<b>Section 6.3 - Changes to the SHRSC &amp; associated monitoring</b>			
Quantitative measurement of environmental factors shall be undertaken initially after any modifications at the SHRSC site and at least annually or after any significant incident or complaint.  Such evaluations would target the effectiveness of range modifications at reducing lead transport.	Completed by ErSed on a quarterly basis including following 2019/20 bushfire incident.	2019/20 Annual Report (ErSed 2020)	C

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) (Arcadis 28 March 2019)			
Section 5.4 - Operational and Environmental Management Actions			
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C - Compliant; NV - Not verified; NC - Non-compliant; Ad NC - Administrative non-compliance; NT - Not triggered; Obs - Observation			
<b>Section 6.4 - Environmental Reporting</b>			
The results of the monitoring are to be incorporated into an annual report to be prepared by OoS and submitted to Water NSW (refer Section 6.4 for scope).	The timing of quarterly monitoring was modified due to access and other impacts and 2019/20 bushfire. This saw timing of the annual report pushed back to September 2020 (i.e. outside the audit period).	2019/20 Annual Report (ErSed 2020)	NT
<b>Section 6.6 - OEMP Review</b>			
A review of the OEMP shall occur at least one annually, to determine whether the OEMP has been implemented and performed as intended, the problems (if any) encountered, and what types of adjustments (if any) would be made.	While not completed within the audit period the review should consider the findings of this inaugural audit which was delayed for reasons beyond the SHRSC control.	Discussion - Venue Manager (VM)	Obs
<b>Section 6.7 - Document Control &amp; Records</b>			
Records that may be useful in evaluating the effectiveness of the OEMP shall be maintained, such as those listed in Section 6.7.	Numerous records maintained as evident through compliance evidence, however demonstration of compliance in certain areas would benefit from additional documented information.  Section 6.7 suggests maintenance of a 'Log of actual implementation dates, problems addressed, associated costs, conditions, problems encountered, and follow-up actions.'	Site inspection  Discussion - Venue Manager (VM)  Information provided by VM and OoS.	Ad NC

## **APPENDIX C: APPOINTMENT OF AUDIT TEAM**



Mrs Robyn Ginger  
Venue Manager  
6 Figtree Drive  
Sydney Olympic Park NSW 2127

17/07/2020

Dear Mrs Ginger

**Southern Highlands Regional Shooting Complex (MP 06\_0232)  
Independent Environmental Audit 2020**

I refer to your request seeking approval of the audit team for the upcoming Southern Highlands Regional Shooting Complex Independent Environmental Audit, in accordance with Schedule 2, Condition A11 of the project approval MP 06\_0232, as modified (the approval).

Having considered the qualifications and experience of Messrs Chris Butler, Luke Merzlikoff and Adam Gilltrap, the Secretary endorses the appointment of Messrs Butler, Merzlikoff and Gilltrap to undertake the audit in accordance with Condition A11 of the approval. This approval is conditional on Messrs Butler, Merzlikoff and Gilltrap being independent of the development.

The audit is to be conducted in accordance with AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing and in accordance with the Independent Audit Post Approval Requirements dated May 2020. A copy of the requirements can be located at <http://planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements>.

The audit report is to include the following:

- consultation with the relevant agencies;
- a compliance table indicating the compliance status of each condition of approval and any relevant EPL;
- not use the term “partial compliance”;
- recommend actions in response to non-compliances;
- review the adequacy of plans and programs required under this consent; and
- identify opportunities for improved environmental management and performance.

Within three months of commissioning of the audit, you are to submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations. Prior to submitting the audit report to the Secretary, it is recommended that you review the report to ensure it complies with the relevant consent condition.

Should you have any enquiries in relation to this matter, please contact Georgia Dragicevic, Senior Compliance Officer on telephone number (02) 4247 1852 or by email to [Georgia.Dragicevic@planning.nsw.gov.au](mailto:Georgia.Dragicevic@planning.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink, appearing to read 'K O'Reilly', enclosed in a thin black rectangular border.

Katrina O'Reilly  
Team Leader - Compliance  
Compliance

As nominee of the Planning Secretary

## **APPENDIX D: SITE INSPECTION PHOTOGRAPHS**



**Plate 1:** Entrance road showing bushfire impact and regrowth (4679).



**Plate 2:** 500 m range, maintained vegetation, waste receptacle and signage (4687).



**Plate 3:** 500 m range treated effluent mound - herbicide application for weed management external to mound compound (4699).



**Plate 4:** 500 m range - herbicide application for weed management (4702).



**Plate 5:** Stormwater basin (4705).



**Plate 6:** 500 m range - minor weed outbreak (4707).



**Plate 7:** Bushfire impact and regrowth - nil edge effect outside swale bund (4710).



**Plate 8:** 500 m range - stopbutt and trench in good order (4713).



**Plate 9:** 500 m range - swale and sediment traps in good order with minor sediment accumulation (4724).



**Plate 10:** 500 m range - tree regrowth on banks of basin (4743).



**Plate 11:** Typical example of native vegetation at range / bushland interface (4750)



**Plate 12:** Typical example of hollow baring trees retained (4772).



**Plate 13:** Typical seed bank / coppice regrowth of native vegetation post bushfire (4777).



**Plate 14:** Waste / recycling receptacles serviced by contractor (4785).



**Plate 15:** 50 m / 500 m range access - typical example of well-maintained access tracks - example of weed outbreak (4788).



**Plate 16:** Vehicle access restriction by boulder (4794).



**Plate 17:** Basin - maintained clearance of tree vegetation (4796).



**Plate 18:** Basin water - signage not suitable for firefighting (4798).



**Plate 19:** Mulching for weed suppression (4800).



**Plate 20:** 50 m range fire hydrant (4812).



**Plate 21:** 50 m range - example of 'no smoking' signage (4814).



**Plate 22:** 50 m range treated effluent mound (4821).



**Plate 23:** 50 m range stormwater basin - maintained free of vegetation (4829).



**Plate 24:** Range mowing / maintenance equipment (4849).

## **APPENDIX E: AGENCY CONSULTATION CORROSPONDENCE**

## Adam Gilltrap

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**From:** Georgia Dragicevic <Georgia.Dragicevic@planning.nsw.gov.au>  
**Sent:** Friday, 4 December 2020 12:42 PM  
**To:** Adam Gilltrap  
**Subject:** RE: Independent Environmental Audit - Southern Highlands Regional Shooting Complex

Hi Adam,

Please look into noise and soil/water monitoring/management.

Kind Regards,  
Georgia

**Georgia Dragicevic**  
**Senior Compliance Officer**

Compliance | Department of Planning, Industry and Environment  
T 02 4247 1852 | M 0439 612 137 | E [georgia.dragicevic@planning.nsw.gov.au](mailto:georgia.dragicevic@planning.nsw.gov.au)  
PO Box 5475, Wollonong NSW 2520  
[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)



**Planning,  
Industry &  
Environment**

*The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.*

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**From:** Adam Gilltrap <adam@preciseenvironmental.com.au>  
**Sent:** Friday, 4 December 2020 12:46 PM  
**To:** Georgia Dragicevic <Georgia.Dragicevic@planning.nsw.gov.au>  
**Subject:** Independent Environmental Audit - Southern Highlands Regional Shooting Complex

Hello Georgia

Precise Environmental are completing the Independent Environmental Audit of the Southern Highlands Regional Shooting Complex required under Condition 11(a) of the current approval (MP06\_0232 MOD 1 To MOD5).

In line with the requirements for the audit, DPIE are invited to raise any questions, concerns, or particular areas of interest it may have with the SHRSC with respect to environmental management.

The audit terms of reference are summarised in the attached.

Completion of the audit has been hampered by restrictions arising from the COVID pandemic and we are now aiming to close out the audit before 18 December.

A response at your earliest convenience would be appreciated.

Regards

Adam Gilltrap BAppSc (Env)

Senior Environmental Scientist  
M: 0409 016 199



T: 07 5593 7848

F: 07 5593 7020

[www.preciseenvironmental.com.au](http://www.preciseenvironmental.com.au)

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## Adam Gilltrap

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**From:** Adam Hook <Adam.Hook@bct.nsw.gov.au>  
**Sent:** Tuesday, 15 December 2020 6:35 AM  
**To:** Adam Gilltrap  
**Subject:** RE: Independent Environmental Audit - Southern Highlands Regional Shooting Complex

Hi Adam,

I believe the original intent of the clause was to ensure that the managers cooperated and implemented where practical, key actions that may be recommended as part of research or work carried out on the site. However, it would be good to see that the current management catered for the threatened species known to occur on site where possible.

I have done a search on threatened fauna records and the main species recorded on site are:

- Yellow Bellied Glider
- Koala
- Barking Owl
- Scarlet Robin
- Varied Sittella
- Powerful Owl (Close by)

The Yellow Bellied Glider, Koala and Powerful Owl have 'Recovery Plans'. The Barking Owl has a draft plan I could find and the others have 'strategies' listed on the OEH website.

I think you may find that the conditions of the Conservation Agreement are consistent with recovery actions, however, it would be good to get the audits opinion on any improvements or additional actions required.

Happy to discuss further.

**Adam Hook**

**Landholder Support Officer**

NSW Biodiversity Conservation Trust

T 02 4887 8260 | M 0427 203 919 | W [www.bct.nsw.gov.au](http://www.bct.nsw.gov.au) | [Who is the BCT?](#)

1323 Nowra Rd Fitzroy Falls NSW 2577



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Conservation  
Trust**

*The NSW Biodiversity Conservation Trust acknowledges the Traditional Custodians of Country throughout NSW and recognises their ongoing connection to land, waters and culture. We pay our respects to their Elders past, present and emerging and seek to genuinely and collaboratively engage with Aboriginal people in the delivery of our private land conservation programs.*

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**From:** Adam Gilltrap <adam@preciseenvironmental.com.au>  
**Sent:** Friday, 4 December 2020 2:41 PM  
**To:** Adam Hook <Adam.Hook@bct.nsw.gov.au>  
**Subject:** FW: Independent Environmental Audit - Southern Highlands Regional Shooting Complex

Hi Adam

Precise Environmental are completing the Independent Environmental Audit of the Southern Highlands Regional Shooting Complex required under Condition 11(a) of the current approval (MP06\_0232 MOD 1 To MOD5).

I would like to discuss a requirement of the conservation agreement (attached) which requires that 'any measures included in relevant recovery plans for any threatened species or communities which or may be found in the conservation area, including the recovery plan for Yellow-bellied Glider, must be implemented.'

Also, relevant agencies are invited to raise any questions, concerns, or particular areas of interest it may have with the SHRSC with respect to environmental management.

The audit terms of reference are summarised in the attached.

Completion of the audit has been hampered by restrictions arising from the COVID pandemic and we are now aiming to close out the audit before 18 December.

A response at your earliest convenience would be appreciated.

Regards

Adam Gilltrap BAppSc (Env)  
Senior Environmental Scientist  
M: 0409 016 199



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F: 07 5593 7020  
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## Adam Gilltrap

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**From:** Adam Hook <Adam.Hook@bct.nsw.gov.au>  
**Sent:** Tuesday, 15 December 2020 7:20 AM  
**To:** Adam Gilltrap  
**Cc:** 'Peter Lee'; robyn.ginger; 'Craig Ginger'  
**Subject:** RE: Independent Environmental Audit - Southern Highlands Regional Shooting Complex

Hi Adam,

I have provided a response this morning to your question on the threatened species clause.

In relation to management of the conservation area:

My understanding is that the shooting complex and resultant Conservation Area was originally excised from the Bargo State Conservation Area. As part of an 'offset package' additional land elsewhere was added to the reserve system and in October 2010 a Conservation Agreement under the NPW Act 1974 was established over the entire site to protect the remaining high conservation values. The shooting ranges and associated facilities are located within a portion of the site zoned SP1 (Special Uses). The remaining area has been zoned E2 Environmental Conservation (effectively the range buffer/danger zone).

I also understand that NSW Office of Sport has a licence agreement, with the Southern Highlands Regional Shooting Complex Inc to allow it occupy Lot 1 DP 1088254 and to operate the shooting complex. The licence includes environmental management and monitoring plans. The adopted management plan is consistent with the previous management of the site i.e.: Nattai Reserves Plan of Management. Aspects of this plan were incorporated into the Conservation Agreement between the Minister administering the Sporting Venues Authority Act and the Minister for the Environment.

My understanding is the management of the total Conservation Area is the responsibility of the Minister administering the Sporting Venues Authority Act and in this case now NSW Office of Sport. Before the Conservation Agreement was impacted by fire, the large majority of the area was good condition native vegetation probably with very few weeds. During the regeneration phase it will be critical to keep an eye out for weed incursions and keep on top of feral animal management. I appreciate some of this will be difficult given the terrain. However, if NSW office of Sport don't have the capacity to manage the surrounding landscape, there is the option to out source or contract required works. It is my understanding, however, that NSW Office of Sport is responsible for the Conservation Agreement compliance.

Happy to discuss further.

**Adam Hook**

**Landholder Support Officer**

NSW Biodiversity Conservation Trust

T 02 4887 8260 | M 0427 203 919 | W [www.bct.nsw.gov.au](http://www.bct.nsw.gov.au) | [Who is the BCT?](#)

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**Biodiversity  
Conservation  
Trust**

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**From:** Adam Gilltrap <adam@preciseenvironmental.com.au>  
**Sent:** Friday, 11 December 2020 5:51 PM  
**To:** Adam Hook <Adam.Hook@bct.nsw.gov.au>  
**Cc:** 'Peter Lee' <peter.lee@sport.nsw.gov.au>; robyn.ginger <robyn.ginger@sport.nsw.gov.au>; 'Craig Ginger' <craig.ginger@sport.nsw.gov.au>  
**Subject:** RE: Independent Environmental Audit - Southern Highlands Regional Shooting Complex

Hi Adam

Thanks for your email.

There was a phone conference with the SHRSC and Peter Lee from the Office of Sport today.

From my view and that of Venue Managers there is confusion as to where the responsibilities lie with respect to the Conservation Agreement. In particular management beyond the developed areas of the shooting range.

If you can assist this is something we would like to clarify through the audit.

Regards

Adam Gilltrap BAppSc (Env)  
Senior Environmental Scientist  
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**From:** Adam Hook <[Adam.Hook@bct.nsw.gov.au](mailto:Adam.Hook@bct.nsw.gov.au)>  
**Sent:** Friday, 11 December 2020 3:32 PM  
**To:** Adam Gilltrap <[adam@preciseenvironmental.com.au](mailto:adam@preciseenvironmental.com.au)>  
**Subject:** RE: Independent Environmental Audit - Southern Highlands Regional Shooting Complex

Hi Adam,

Apologies for the delay. I am still seeking some advice as to the original intent of the clause. I will come back to you with an update by COB this Monday.

Regards,

**Adam Hook**  
**Landholder Support Officer**  
NSW Biodiversity Conservation Trust



## Biodiversity Conservation Trust

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**From:** Adam Gilltrap <[adam@preciseenvironmental.com.au](mailto:adam@preciseenvironmental.com.au)>  
**Sent:** Friday, 11 December 2020 11:30 AM  
**To:** Adam Hook <[Adam.Hook@bct.nsw.gov.au](mailto:Adam.Hook@bct.nsw.gov.au)>  
**Subject:** RE: Independent Environmental Audit - Southern Highlands Regional Shooting Complex

Hi Adam

Are you able to provide any response to my query.

Regards

Adam Gilltrap BAppSc (Env)  
Senior Environmental Scientist  
M: 0409 016 199



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**Sent:** Friday, 4 December 2020 1:41 PM  
**To:** 'Adam.Hook@bct.nsw.gov.au' <[Adam.Hook@bct.nsw.gov.au](mailto:Adam.Hook@bct.nsw.gov.au)>  
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