

Attachment A: Statement of compliance against Construction Environmental Management Plan commitments – 6 October 2024 to 5 October 2025.

COMMITMENT	COMMITMENT DETAIL	COMMENTS	COMPLIANT
Section 4.1	<p>Site induction training must be carried out for all site-based staff prior to the commencement of construction activities. Any new staff joining the project once construction has commenced will undergo inductions prior to commencing their construction activities. The induction process will make staff aware of the following:</p> <ul style="list-style-type: none"> <li>• Awareness of key sensitive receptors</li> <li>• The procedures set out in this CEMP</li> <li>• Their role and responsibility in the implementation and monitoring of the CEMP for the duration of the construction phase</li> <li>• A list of people and/ or organisations to be contacted in the event of an environmental incident</li> </ul>	<p>A commitment to induction training is contained both within Pilbara Ports Construction Environmental Management Plan (<b>CEMP</b>) and the Contractor's CEMP.</p> <p>Pilbara Ports CEMP reference: A1043899</p> <p>Contractor's CEMP, reference: A1705387</p> <p>Induction evidence: Daily Environmental Reports are supplied by the Contractor and contain information on inductions that have been completed to demonstrate compliance with this commitment, Pilbara Ports reference: qA45988</p>	Compliant
Section 4.1	<p>The Contractor(s) will be required to demonstrate that environmental issues and the requirements of the CEMP are adequately communicated to the work teams. Examples of methods / forum which will be used include but are not limited to:</p> <ul style="list-style-type: none"> <li>• Site environmental inductions, with assessment</li> <li>• Project kick-off meetings</li> <li>• Daily pre-start meetings</li> <li>• Tool-box meetings</li> <li>• Incident bulletins</li> <li>• Environmental bulletins</li> </ul> <p>The Contractor(s) will be required to keep</p>	<p>The Contractor supplies Daily Environmental Reports which include communication regarding inductions, kick-off meetings, pre-start meetings, and bulletins.</p> <p>Daily Environmental Reports are available on Pilbara Ports document management system and detail that this communication has been completed. Pilbara Ports reference: qA45988</p> <p>Additional evidence showing detail of the communication is available at Pilbara Ports reference: fA144318</p>	Compliant

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	records of the above (as applicable) for review by the principal on request		
Section 5.1 (Table 6)	Contractor(s) must undertake an environmental induction for all site staff, providing information on marine fauna awareness and associated management and monitoring protocols (Appendix A).	The Contractor has supplied evidence of completed inductions for all staff. This includes marine fauna awareness and associated management and monitoring protocols. This detail is available at Pilbara Ports reference: fA144318	Compliant
Section 5.1 (Table 6)	Appoint suitably trained marine fauna observers (MFOs) tasked with monitoring for marine fauna to avoid and minimise impacts relating to blasting and piling (noise generating activities).	The Contractor has assigned suitably trained MFO to monitor for marine fauna during blasting and piling activities.  Pilbara Ports reference: <ul style="list-style-type: none"> <li>MFO Training register and content: fA162053</li> <li>MFO Logs: fA161016</li> </ul>	Compliant
Section 5.1 (Table 6)	Educate contractor(s) that the MFO has the responsibility and powers of suspending blasting and piling activities based on the monitoring protocols and procedures (Appendix A).	The Contractor has assigned suitably trained MFO who have the powers to suspend blasting or piling.  MFO Training register and content is available at Pilbara Ports reference: fA162053	Compliant
Section 5.1 (Table 6)	A suitably trained MFO must be on duty at all times during targeted noise generating activities (i.e. piling and blasting)	The Contractor has assigned suitably trained MFO to monitor for marine fauna during blasting and piling activities.  MFO Logs detail MFO personnel, sightings and actions taken and are available at Pilbara Ports reference: fA161016	Compliant
Section 5.1 (Table 6)	An additional suitably trained MFO on a dedicated MFO roaming vessel will be used	The Dredging Contractor assigned suitably trained MFO to monitor for marine fauna during blasting activities, stationed on a roaming vessel.	Compliant

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	during blasting works to verify no marine fauna in blasting observation zones.	MFO Logs detail MFO personnel, sightings and actions taken and are available at Pilbara Ports reference: fA161016	
Section 5.1 (Table 6)	A suitably trained marine fauna observer ( <b>MFO</b> ) must be on duty on transiting vessels during all targeted noise generating activities (i.e. piling and blasting).	The Contractor has suitably trained MFO on duty on transiting vessels to monitor for marine fauna during noise generating (e.g., blasting and piling) activities.  MFO Logs detail MFO personnel, sightings and actions taken and are available at Pilbara Ports reference: fA161016	Compliant
Section 5.1 (Table 6)	Contractor(s) to undertake all specified monitoring protocols and procedures in relation to piling and blasting activities (Appendix A).	All specified monitoring protocols and procedures in relation to piling and blasting activities were undertaken, in compliance with the approved Pilbara Ports CEMP and the Contractor's CEMP.  Pilbara Ports CEMP, Pilbara Ports reference: A1043899  Contractor's CEMP, Pilbara Ports reference: A1705387  Records of monitoring protocols and procedures undertaken during the Reporting Period are contained within compliance folders, Pilbara Ports reference: qA45988	Compliant
Section 5.1 (Table 6)	Piling and blasting must not occur concurrently or within 24 hours of each other (to minimise cumulative exposure).	Blasting was completed prior to commencement of piling. Last day of blasting was 30 April 2025. First day of piling was 14 June 2025.	Compliant
Section 5.1 (Table 6)	Blasting will be undertaken at low tide where practicable and must be undertaken below daily	The Contractor supplies Daily Environmental Reports which include information of tide levels.	Compliant

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	mid-tide (the level or height midway between high- and low-water marks) to reduce exposure ranges and minimise underwater noise impacts.	All blasting was undertaken below daily mid-tide level to reduce underwater noise impacts. Pilbara Ports reference: qA45988	
Section 5.1 (Table 6)	Air bubble curtain technology must be installed during blasting and piling.	<p>Air bubble curtain technology was installed during blasting and piling activities. The Contractor supplies Daily Environmental Reports that details installation and operation of the air bubble curtain. A minimum weekly inspection is carried out by the Pilbara Ports Environment and Heritage Team to verify operation and efficacy of the air bubble curtain.</p> <p>Daily Environmental Report evidence is available at Pilbara Ports reference: qA45988</p> <p>There were two potential non-compliance incidents reported to DCCEEW during the Reporting Period, regarding effective use of the air bubble curtain, please refer to Table 3, Condition 26 of the Annual Compliance Report for further detail.</p>	Compliant
Section 5.1 (Table 6)	To minimise light pollution impacts to EPBC listed turtles and EPBC listed birds, artificial lighting during the operational phase of the Project must be in accordance with the Commonwealth of Australia National Light Pollution Guidelines for Wildlife including Marine Turtles, Seabirds and Migratory Shorebirds (DCCEEW 2023) (Appendix B).	No operational lighting has been installed.	Compliant
Section 5.1 (Table 6)	Contractor to immediately report any environmental incidents or non-conformance to the Pilbara Ports' Representative (without delay). If an incident occurs, contractor to submit an incident report immediately or before the end of	The Contractor reports incidents as per the CEMP. These are reported via Pilbara Ports online Hazard and Incident Management System. Environmental incidents are also	Compliant

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	the shift, as outlined in the incident reporting procedures in Section 6.1 of the CEMP	documented within Pilbara Ports Document Management System (Objective).  Pilbara Ports reference: fA138817  Incidents are logged via the DBHF - Safety and Environment Electronic Management Register and Pilbara Ports Incident Management System. Pilbara Ports reference: A1892054	
Section 5.1 (Table 6)	A log detailing marine fauna sightings and activities will be maintained on all piling vessels	MFO Logs are kept by the Contractor and Sub-contractors and detail assigned MFO personnel, sightings, and actions taken during piling and are available at Pilbara Ports reference: fA161016	Compliant
Section 5.2 (Table 7)	To mitigate the risk of waste and/or hydrocarbon pollution impacting EPBC listed marine fauna and EPBC listed birds: All waste must be stored in labelled containers which can accommodate the type, volume, and frequency of use and with covers or lids that close effectively and are used effectively to prevent the escape of waste whether aided by wind, fauna, spillage or other circumstance.	Compliance was determined through an audit against the Sea Dumping Permit and Contractor and Pilbara Ports Dredging Environmental Management Plan.  A waste manifest was kept during dredging as well as evidence of waste transfer, waste storage and segregation. Pilbara Ports reference: qA41492  Pilbara Ports conducts (minimum) weekly site inspections of the project area, this includes checking that waste and/or hydrocarbons are stored, labelled and handled appropriately.  Incidents are logged via the DBHF - Safety and Environment Electronic Management Register and Pilbara Ports Incident Management System. Pilbara Ports reference: A1892054	Compliant
Section 5.2 (Table 7)	All loads arriving or leaving the site will be appropriately secured	Pilbara Ports routinely checks vehicles arriving to site. Inspection results are compiled into monthly	Compliant

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		reports and provided to the Environment and Heritage Team. Monthly statistics for the period Oct – Dec 2024, Pilbara Ports reference: A1929597.  Monthly statistics for the period Jan – Oct 2025, Pilbara Ports reference: A1929595	
Section 5.2 (Table 7)	Provide information regarding waste management in site specific inductions, including waste separation and importance of securing vehicle loads.	Evidence of induction content (Daily Environmental Reports) is provided to Pilbara Ports by the Contractor as well as evidence of inductions being completed.  Daily Environmental Reports, Pilbara Ports reference: qA45988  Evidence of inductions, Pilbara Ports reference: fA144318	Compliant
Section 5.2 (Table 7)	Ensure licensed contractors are used to collect controlled wastes	Waste disposal records are kept. An example is available at Pilbara Ports reference: A1863348  Details of wastes are provided in Daily Environmental Reports, Pilbara Ports reference: qA45988	Compliant
Section 5.2 (Table 7)	Ensure all hazardous materials are appropriately disposed of and records kept	Waste disposal records are kept, Pilbara Ports reference: A1863348  Details of wastes are provided in Daily Environmental Reports, Pilbara Ports reference: qA45988	Compliant
Section 5.2 (Table 7)	Daily inspection of work site to occur. Review of waste bins (% full, time to next service).	Daily Environmental Reports include inspection of work site, including waste bin inspection. Pilbara Ports reference: qA45988	Compliant

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Section 5.2 (Table 7)	Waste volumes leaving site from waste contractors.	Waste disposal records are kept, Pilbara Ports reference: A1863348 Details of wastes are provided in Daily Environmental Reports, Pilbara Ports reference: qA45988	Compliant
Section 5.2 (Table 7)	Contractor to immediately report any non-conformance to Pilbara Ports' Representative (without delay).	The Contractor reports incidents as per the CEMP. These are reported via Pilbara Ports online Incident Management System. Environmental incidents are also documented within Pilbara Ports Document Management System (Objective).  Pilbara Ports reference: fA138817  Incidents are logged via the DBHF - Safety and Environment Electronic Management Register and Pilbara Ports Incident Management System. Pilbara Ports reference: A1892054	Compliant
Section 5.2 (Table 7)	If an incident occurs, contractor to submit an incident report immediately or before the end of the shift, as outlined in the incident reporting procedures in Section 6.1 of this CEMP.	The Contractor reports incidents as per the CEMP. These are reported via Pilbara Ports online Incident Management System. Environmental incidents are also documented within Pilbara Ports Document Management System (Objective).  Pilbara Ports reference: fA138817  Incidents are logged via the DBHF - Safety and Environment Electronic Management Register and Pilbara Ports Incident Management System. Pilbara Ports reference: A1892054	Compliant
Section 5.3 (Table 8)	All hydrocarbons to be stored in an appropriate bund that is capable of holding 110% of a spill	The Contractor supplies Daily and Weekly Environmental Inspection Reports, Pilbara Ports	Compliant

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	from the largest container, or 10% of total volume of stored liquids, whichever is greater.	also conducts (minimum) weekly site inspections. Pilbara Ports reference qA45988	
Section 5.3 (Table 8)	Refuelling of vehicles/equipment will be undertaken on land (not over water) using appropriate bunding / drip trays unless the task is not possible. When refuelling of plant / equipment must be undertaken on / over water, a targeted risk assessment will be conducted, and appropriate spill prevention / containment controls implemented.	<p>Refuelling is done via a service truck on land, with mitigation controls in place. There have been no diesel spills during refuelling.</p> <p>The Contractor reports incidents as per the CEMP. These are reported via Pilbara Ports online Incident Management System.</p> <p>Environmental incidents are also documented within Pilbara Ports Document Management System (Objective).</p> <p>Pilbara Ports reference: fA138817</p> <p>Incidents are logged via the DBHF - Safety and Environment Electronic Management Register and Pilbara Ports Incident Management System. Pilbara Ports reference: A1892054</p>	Compliant
Section 5.3 (Table 8)	To reduce the impact of a spill, the lowest volume of hydrocarbons required will be stored in proximity to the marine environment and in the onshore lay down areas.	<p>Minimal stores of hydrocarbons are kept on site.</p> <p>The Contractor supplies Daily and Weekly Environmental Inspection Reports, Pilbara Ports also conducts (minimum) weekly site inspections. Pilbara Ports reference: qA45988</p>	Compliant
Section 5.3 (Table 8)	A copy of the current hydrocarbon Safety Data Sheet (SDS) will be kept at an appropriate location on site.	<p>The Contractor supplies Daily and Weekly Environmental Inspection Reports, Pilbara Ports also conducts (minimum) weekly site inspections. Pilbara Ports reference: qA45988</p> <p>On Site SDS Photos are stored within Pilbara Ports Document Management System (Objective). Pilbara Ports reference: A1863350</p>	Compliant

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Section 5.3 (Table 8)	Drip trays must be placed under mechanical stationary equipment such as gensets if such equipment is not internally bunded.	There are minimal numbers of stationary mechanical equipment on site. Generators and compressors are self-bunded.  The Contractor supplies Daily and Weekly Environmental Inspection Reports, Pilbara Ports also conducts (minimum) weekly site inspections. Pilbara Ports reference: qA45988	Compliant
Section 5.3 (Table 8)	All equipment will be regularly serviced to reduce emissions and reduce the chance of oil leaks on site and in marine environments. Appropriate controls must be in place to contain hydrocarbon leaks should they occur whilst servicing. Controls may include servicing on sealed areas, use of drip trays when changing oil and transporting waste oils in bunded containers.	Contractor conducts routine off-site servicing with spill protection in place. The Project area is regularly inspected for signs of spills.  The Contractor supplies Daily and Weekly Environmental Inspection Reports, Pilbara Ports also conducts (minimum) weekly site inspections. Pilbara Ports reference: qA45988	Compliant
Section 5.3 (Table 8)	Only qualified personnel are to carry out services on plant, equipment and vessels.	Routine maintenance (greasing, fluid level checks) is carried out by experienced operators. More extensive services / repairs are completed by qualified tradesmen.  The Contractor supplies Daily and Weekly Environmental Inspection Reports, Pilbara Ports also conducts (minimum) weekly site inspections. Pilbara Ports reference: qA45988	Compliant
Section 5.3 (Table 8)	A prescribed Isolation procedure must be followed prior to work on any plant or equipment.	These are prescribed in Safe Work Method Statements. Pilbara Ports reference: PID766-CLPL-HS-PLA-0023	Compliant
Section 5.3 (Table 8)	Training / awareness on hydrocarbon risks to be included in site induction (including all staff, contractors, subbies etc.).	The Contractor supplies Daily Environmental Reports which include communication regarding inductions, kick-off meetings, pre-start meetings, and bulletins.	Compliant

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		<p>Daily Environmental Reports which include detail that this communication has been completed is available at Pilbara Ports reference: qA45988</p> <p>Additional evidence showing detail of the communication is available at Pilbara Ports reference: fA144318</p>	
Section 5.3 (Table 8)	Appropriate volume and type of spill response materials will be available at each work site.	The Contractor supplies Daily and Weekly Environmental Inspection Reports, Pilbara Ports also conducts (minimum) weekly site inspections. Pilbara Ports reference: qA45988	Compliant
Section 5.3 (Table 8)	All spills (regardless of volume) will be contained and cleaned up immediately. Resultant wastes (soils, rags and absorbent material) appropriately stored and disposed of by an appropriately licenced waste contractor as controlled waste.	<p>The Contractor reports incidents as per the CEMP. These are reported via Pilbara Ports online Incident Management System. Environmental incidents are also documented within Pilbara Ports Document Management System (Objective).</p> <p>Pilbara Ports reference: fA138817</p> <p>Incidents are logged via the DBHF - Safety and Environment Electronic Management Register and Pilbara Ports Incident Management System. Pilbara Ports reference: A1892054</p>	Compliant
Section 5.3 (Table 8)	All spills (regardless of volume) reported and investigated as required.	<p>The Contractor reports incidents as per the CEMP. These are reported via Pilbara Ports online Incident Management System. Environmental incidents are also documented within Pilbara Ports Document Management System (Objective).</p> <p>Pilbara Ports reference: fA138817</p>	Compliant

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		Incidents are logged via the DBHF - Safety and Environment Electronic Management Register and Pilbara Ports Incident Management System. Pilbara Ports reference: A1892054	
Section 5.3 (Table 8)	<p>Report any discharge of hydrocarbons to the marine environment (irrespective of quantity / volume) to PPA Vessel Traffic Services without delay on 08 9159 6556 or VHF Ch 11 or 16.</p> <ul style="list-style-type: none"> <li>All marine pollution events must be reported to the Department of Transport (DoT) electronically via "Pollution Report" (POLREP) form in accordance with PPAs Port of Dampier Handbook.</li> <li>A documented report provided to the PPA Representative on the incident, including (as a minimum) details of the incident, the measures taken, the success of those measures in addressing the incident or risk and any additional measures proposed to be taken.</li> </ul> <p>All spills to land must be reported to the PPA Representative in accordance with PPAs Incident Management Procedure.</p>	<p>The Contractor reports incidents as per the CEMP. These are reported via Pilbara Ports online Incident Management System. Environmental incidents are also documented within Pilbara Ports Document Management System (Objective).</p> <p>Pilbara Ports reference: fA138817</p> <p>Incidents are logged via the DBHF - Safety and Environment Electronic Management Register and Pilbara Ports Incident Management System. Pilbara Ports reference: A1892054</p>	Compliant
Section 5.4 (Table 9)	<p>WA DPIRD's 'Vessel Check' risk assessment (<a href="https://vesselcheck.fish.wa.gov.au">https://vesselcheck.fish.wa.gov.au</a>) submitted to PPA (including supporting documentation) for all Project construction support vessels (i.e. Barges) that mobilise to the Port of Dampier from interstate or international waters. Risk assessment must indicate that the vessel poses a Low risk (or otherwise excepted by DPIRD) of invasive marine species (<b>IMS</b>) to Port of Dampier waters. Note: All domestic commercial vessels</p>	<p>Dredging Vessels mobilised from outside of Western Australian waters were subject to IMS risk assessments. All vessels assessed were determined to represent a low risk of introducing an Invasive Marine Species to WA.</p> <p>IMS assessment of dredging vessels is contained at Pilbara Ports reference: fA135454</p>	Compliant

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	mobilising from other Ports within the Pilbara region are considered exempt from this process.		
Section 5.4 (Table 9)	All vessels will have a ballast water management plan and ballast water exchanges will be in accordance with IMO requirements and the <i>Commonwealth Biosecurity Act 2015</i> .	Dredging Vessels mobilised from outside of Western Australian waters were subject to IMS risk assessments. All vessels assessed were determined to represent a low risk of introducing an Invasive Marine Species to WA.  IMS assessment of dredging vessels is contained at Pilbara Ports reference: fA135454	Compliant
Section 5.4 (Table 9)	Continue to implement the State Wide Array Surveillance Program (SWASP) in collaboration with DPIRD and WA Port Authorities within Western Australia.	Pilbara Ports continues to participate in the SWASP. Pilbara Ports coordinates deployment of monitoring equipment at numerous sites throughout the Pilbara.  There have been no discoveries of new invasive marine pests. <i>Didemnum perlucidum</i> was detected at the Port of Dampier; however, this species has been previously detected at the Port of Dampier and is considered cryptogenic and widespread within Western Australian waters.  Past and current SWASP information is at Pilbara Ports reference: fA136793  SWASP Monitoring Reports are generated by DPIRD. There have been no detections of Introduced Marine Pests requiring reporting to DPIRD.  SWASP Monitoring Reports are contained at Pilbara Ports reference: fA136793	Compliant

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Section 5.5	<p>In the event there is a change in equipment, vessels, machinery, materials used for construction, procedures, processes or roles and responsibilities during the construction phase the following information should be written in a management of change document:</p> <ul style="list-style-type: none"> <li>• Reasons for change – Why is it needed and what are beneficial outcomes of the change</li> <li>• Determine the scope – Who will the change impact, what policies and processes will it impact</li> <li>• Who is responsible for the change</li> <li>• How will this change be executed to employees, contractor(s) and other stakeholders</li> </ul> <p>The management of change should be approved by the PPA Representative prior to the execution of the change.</p>	<p>Management of Change and Permit to Work System are referenced in the Contractors Health and Safety Management Plan. Pilbara Ports reference: A1974370</p>	Compliant
Section 6.2	<p>In the event of an unexpected find including cultural heritage items or new material suspected of containing potentially hazardous substances, the following procedures should be implemented:</p> <ul style="list-style-type: none"> <li>• Stop/prevent any activity in the area</li> <li>• Place signage and barricade area – make area safe. Do not touch or disturb the item/material</li> <li>• Report the Unexpected Occurrence/Finding to Pilbara Ports</li> <li>• Record the location, visual appearance, odour, and extent, type of accident or material and mode of discovering the material to Pilbara Ports</li> <li>• Obtain assistance from a suitably qualified practitioner in identifying the</li> </ul>	<p>No finds discovered.</p> <p>Daily Environmental Reports are supplied by the Contractor and contain information on inductions that have been completed to demonstrate compliance with this commitment, Pilbara Ports reference: qA45988</p>	Compliant

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	<p>potential hazard to human health or the environment in accordance with regulatory requirements. For cultural heritage items refer to PPAs Cultural Heritage Management Plan (CHMP)</p> <ul style="list-style-type: none"> <li>• Establish management actions in compliance with regulatory requirements</li> <li>• Obtain the approval from PPA and of the relevant regulator for the proposed management actions</li> <li>• Implement the approval management action plan and seek on-going advice as necessary</li> <li>• Document the findings and compliance with the approved action plan and provide documentation to the Pilbara Ports</li> <li>• Update the CEMP procedures and controls as required</li> </ul>		