

Summary of 2025 CPS 818 External Compliance Audit and Corrective and Improvement Actions

Background

Main Roads' statewide clearing permit CPS 818, which has been in operation since 2006, is critical to its business as it facilitates the timely delivery of critical road projects. The permit authorises Main Roads to undertake clearing, subject to a number of conditions. Condition 15 of the permit requires Main Roads to undertake an external audit of compliance with the permit every two years.

The 2025 external audit was undertaken by Preston Consulting for clearing between 1 January 2023 and 31 December 2024.

Project Selection

A risk-based assessment, which was reviewed and approved by the Department of Environment and Water Regulation (DWER), was undertaken by Preston Consulting to select the projects to be audited. The selection process identified 22 projects to be audited, with at least two from each region. The audit report provides further information on each project selected.

Audit Report and Results

Preston Consulting's full audit report, along with previous audit reports, is available on Main Road's website at www.mainroads.wa.gov.au/community-environment/environment/clearing-and-revegetation/compliance-audit. A total of 1,936 obligations against the conditions of CPS 818/17 were identified for assessment of compliance across the 22 projects (the number of sub-conditions multiplied by the number of selected projects to be assessed). Of the 1,936 obligations, 1,056 (55%) of the obligations were not applicable due to the low complexity of the clearing activities or timing of the revegetation, rehabilitation or monitoring actions.

A summary of the overall assessment outcomes is provided in Table 1.

Table 1: Compliance Summary for Applicable and Not Applicable Conditions

Outcomes	Quantity	Percentage
Compliant	864	98%
Observation for Improvement	11	1%
Non-Compliant	5	1%
Total Applicable Conditions (excluding N/A)	880	100%
Not Applicable Conditions	1056	55%
Total Conditions including N/A	1936	100%

Of the 880 applicable conditions, 864 (98%) were assessed as compliant, with five non-compliances (1%) and eleven (1%) observations for improvement identified.

Corrective and Improvement Actions

Table 2 and Table 3 provides a summary of the non-compliances and observations, and the proposed corrective and improvement actions.

Table 2: Corrective Actions for Non-compliances

Finding Category	CPS 818/15 Condition	Project	Corrective Actions
Insufficient evidence to demonstrate clean on entry or clean on exit was implemented.	Condition 10 (a)	South West region - Goodwood Road Upgrades 34.5 - 36.5 SLK	While the requirement for all vehicles, machines and plant to be clean on entry and exit is a standard operating procedure for Main Roads projects, obtaining the evidence from contractors that it has been undertaken has been difficult.
No records of Hygiene Checklists to demonstrate implementation of DBCA endorsed management actions for minimising the spread of dieback. This NC relates to the same clean on entry and exit requirement as discussed above.	Condition 10 (c)	South West region - Goodwood Road Upgrades 34.5 - 36.5 SLK	To improve the consistency in which hygiene evidence is obtained, Main Roads is expanding their Construction and Maintenance Reporting Portal to include the requirement for contractors to upload environmental compliance evidence for their projects on a more regular basis than just at the end of a project.
Insufficient evidence to demonstrate clean on entry or clean on exit was implemented, as also noted in condition 10(a) above. This NC relates to the same clean on entry and exit requirement as discussed above.	Condition 10 (f) & (i)	South West region - Goodwood Road Upgrades 34.5 - 36.5 SLK	The Reporting Portal will have an expanded environmental workflow that includes a site reviewer responsibility to ensure the correct information is being received. The number of external compliance audits has significantly increased for projects using CPS 818 and Main Roads are rolling out a contractor's environmental training session in January 2026 to assist with improving compliance.
Insufficient evidence to demonstrate record keeping of clean on entry / clean on exit. This NC relates to the same clean on entry and exit requirement as discussed above.	Condition 13 (d) (v)	South West region - Goodwood Road Upgrades 34.5 - 36.5 SLK	In addition, the audit findings will be discussed in a training session focused on continual improvement with all Environmental Officers and Project Managers to highlight the importance of clean-on-entry and clean-on-exit evidence, as well as effective record keeping related to these requirements.
The CAR was not published on the external website within the three months after clearing commenced.	Condition 14 (e)	Wheatbelt - H052 Brookton Hwy 315 SLK Intersection Upgrade	The internal process required for publishing the clearing document on the external website within the required three month timeframe has been improved since this condition was recently introduced in CPS 818/17 in November 2023.
		South West region - South Western Hwy - Brunswick to Roelands Reconstruction and Seal Widening	The review system has been revised to include the directive for Environmental Officers to send the document to be published on the website no later than three months after clearing commenced. A direct weblink to the Main Roads Strategy and Communications team has been incorporated into Main Roads procedures. This is an administrative finding with no impact on the environment.

Table 3: Improvement actions for Observations

Finding	CPS 818/17 Condition	Project	Improvement action
Lack of evidence of clean on exit. The auditor notes clean on exit requires provision of washdown equipment on site, even though washing down of equipment may be best completed off-site.	Condition 10 (a)	Great Southern region– Albany Ring Road Stage 2 and 3 (3a only) Metropolitan - Mitchell Freeway Southbound Widening and Smart Freeway Hester to Warwick (2023) Midwest-Gascoyne region - Indian Ocean Drive Jurien to Brand Hwy Upgrade Stage 2 Widening South West region - Forrest Highway and Binningup Road Northbound Acceleration Lane	Improvement actions will be similar to the corrective actions detailed in Table 2. It is considered that the clean on exit requirement should be reviewed as establishing on site clean down facilities may not provide a good environmental outcome, especially where designated washdown facilities are present at nearby depots, avoiding run-off going into adjacent vegetation. Where vehicles and plant are exiting the site on bitumen, the risk of spreading dieback and weeds is significantly reduced. Main Roads will continue to consult with DWER regarding the wording on this requirement to ensure a good environmental outcome is achieved.
Clean on exit points were not included in Dieback Management Plan. No evidence of implementation of provided.	Condition 10 (d) (v)	Midwest – Gascoyne region - Indian Ocean Drive Jurien to Brand Hwy Upgrade Stage 2 Widening	The clean on entry points established for areas where dieback is infested and uninterpretable will also be signposted as the “clean on exit” points.
Lack of evidence of clean on exit as per condition 10(a) (item 1 of this table). Same clean machinery requirement as is required for dieback control. Clean on exit requires provision of washdown equipment on site where washdown may be best completed off-site	Condition 10 (f) (1)	Great Southern region – Albany Ring Road Stage 2 and 3 (3a only) Midwest – Gascoyne region - Indian Ocean Drive Jurien to Brand Hwy Upgrade Stage 2 Widening South West region- Forrest Highway and Binningup Road Northbound Acceleration Lane	See improvement actions above.
Controls under condition 10(f) were marked as OB due to no clean on exit, as also noted in conditions 10(a) and 10(f)(i) (items 1 and 3 of this table).	Condition 13 (d) (v)	Great Southern region– Albany Ring Road Stage 2 and 3 South West region- Forrest Highway and Binningup Road Northbound Acceleration Lane	