

Summary of the Findings of the 2023 External Audit of Compliance with CPS 818 and the Improvement Actions to be undertaken by Main Roads

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 every two years.

The 2023 external audit was undertaken by Preston Consulting for clearing between 1 January 2022 and 31 December 2022. An extraction of Preston Consulting's Executive Summary is provided below:

Executive Summary

Main Roads has been granted Clearing Permit (CPS) 818 under section 51E of the Environmental Protection Act 1986 (EP Act) that authorises MRWA to undertake native vegetation clearing for a range of defined activities across Western Australia (WA). The clearing is necessary for the upgrade and maintenance of the State's main road network. The Clearing Permit has been structured to provide a predictable set of conditions that apply to clearing works and is revised with different versions to allow for continuous improvement and adaptive management. It is designed to cover smaller scale clearing activities that do not present significant environmental risks that would necessitate clearing to be assessed under Part IV of the EP Act.

Main Roads requested Preston Consulting to conduct an external compliance audit against conditions of the CPS 818, specifically the CPS 818/15 version. The audit process was designed to systematically gather objective evidence to evaluate the level of compliance with the CPS 818/15 conditions for each of the eight Main Roads projects selected.

In order to select a range of projects with different risk settings, the risk assessment evaluated the following aspects:

- 1. The extent of clearing of native vegetation undertaken;*
- 2. The project's purpose and complexity, in relation to variance with clearing principles and the preparation of an assessment report requirement; and*
- 3. The project's revegetation, Vegetation Management Plan (VMP), dieback management plan or offset requirements.*

Eight of the projects that were cleared under CPS 818 in the period 1 January to 31 December 2022 were audited. A total of 624 compliance obligations were identified for assessment related to the eight projects assessed. This included one project from each of the eight Main Roads regions as outlined below:

- *Thomas Road - Casuarina - Roundabout Construction (Metropolitan Region - MET)*
- *Muir Highway - Low Cost Shoulder Sealing 9 - 19 SLK (South West Region - SWR)*
- *Great Eastern Highway Walgoolan to Southern Cross - Package 1A (Wheatbelt Region - WBR)*
- *Gordon South Stage 1 - Albany Highway Reconstruction (Great Southern Region - GSR)*
- *Coolgardie Esperance Highway, Upgrade - Emu Rocks (Goldfields Esperance Region - GER)*
- *Great Northern Highway, 966 SLK Material Pit (Mid West Gascoyne Region - MWG)*
- *Mt Lockyer Strategic Material Pit (Pilbara Region - PIL)*
- *Kimberley Materials Strategy-GRR SLK 146 & 162 Area 34 & 35 (Kimberly Region - KIM).*

Of the 624 requirements that were audited, no Non-Conformances were identified. A total of 382 items were compliant, along with one observation and two opportunities for improvement. A total of 239 requirements were considered Not Applicable due to the low complexity of the clearing activities, or the clearing activity did not trigger the need for revegetation/monitoring. The audit findings for each project are shown in Table 1.

Table 1: Summary of Findings of CPS 818 Audit

MRWA Region	Project Name	No. of Conditions Audited					Total
		C	OFI	OB	NC	NA	
Metropolitan	Thomas Road - Casuarina - Roundabout Construction	71	0	0	0	7	78
South West Region	Muir Highway - Low Cost Shoulder Sealing 9 - 19 SLK	38	0	0	0	40	78
Wheatbelt Region	Great Eastern Hwy Walgoolan to Southern Cross - Package 1A	50	0	0	0	28	78
Great Southern Region	Gordon South Stage 1 - Albany Highway Reconstruction	53	0	1	0	24	78
Goldfields – Esperance	CEH Upgrade - Emu Rocks	44	0	0	0	34	78
Midwest - Gascoyne Region	GNH 966 SLK Material Pit	27	1	0	0	50	78
Pilbara Region	Mt Lockyer Strategic Material Pit	60	0	0	0	18	78
Kimberley Region	Kimberley Materials Strategy-GRR SLK 146 & 162 Area 34 & 35 (162)	39	1	0	0	38	78
Total		382	2	1	0	239	624

Table 2 provides a summary of the observation and opportunities for improvement recorded and the proposed improvement actions to be undertaken.

Table 2: Improvement Actions for the Observation and Opportunities for Improvement Recorded

Finding Category	CPS 818/15 Condition	Project	Improvement Actions
Observation related to inconsistency within the Clearing Assessment Report (CAR) where it was stated that there was no temporary clearing proposed, but CAR also stated that the road reserve and DPLH reserve cleared for side track construction were to be revegetated.	Condition 9(a)	Gordon South Stage 1 – Albany Highway	<p>Greater clarification is required within the CAR to identify the revegetation that is required to comply with CPS 818 for temporary clearing and the revegetation of areas planned for the project that involve non-temporary cleared areas, ie paddocks. Project revegetation not associated with temporary clearing is typically not included within CARs, however, as the revegetation of paddocks and redundant road areas was proposed as an offset for threatened flora that was cleared using CPS 818, it was included within the CAR.</p> <p>Audit findings have been discussed with all Environmental Officers to highlight importance of categorising the revegetation works proposed for projects, especially where the project requires clearing to be undertaken using CPS 818.</p>
Opportunity for improvement related to the Preliminary Clearing Impact Assessment stating that no temporary clearing was to occur. However, it was noted that the clearing was for a material pit, which is considered temporary works as per CPS 818/15 Definitions.	Condition 9(a)	Great Northern Highway 966 SLK Material Pit	When clearing for long term strategic pits that are left open for many years, the assessment report will provide reasoning and clarification why the proposed clearing is not considered temporary.
Opportunity for improvement related to a discrepancy between the hectares reported to be cleared and the clearing area shapefile. One of the 2022 clearing events was registered twice in the record keeping system, resulting in the record stating a total of 3.26 ha was cleared, rather than actual clearing of 2.38 ha.	Condition 6(d)	Kimberley Materials Strategy-Gibb River Road SLK 162	Main Roads has developed a new "Approved Clearing" geo-database and is currently developing an "As-Cleared" layer to improve record keeping and further improve its record keeping and compliance.