

Summary of the Findings of the 2021 External Audit of Compliance with CPS 818 and the Corrective and 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 requires Main Roads to undertake an external audit every two years.

The audit was undertaken by GHD Pty Ltd between September and October 2021. The GHD Executive Summary is provided below:

Executive summary

Condition 16 of Main Roads' state-wide Clearing Purpose Permit (CPS) 818/15 requires biennial external audit of compliance with Conditions of the Permit. This audit was conducted to satisfy that condition and involved risk-based selection of eight projects cleared under the Permit during 2020 and desktop evaluation of their compliance with Permit conditions. Projects were assessed against the version of the Permit relevant at the time of clearing approval (CPS 818/13, 14 or 15). This report is subject to, and must be read in conjunction with, the limitations set out in Section 1.2 and assumptions and qualifications contained throughout the Report.

The audit found requirements of the Clearing Permit were generally well met. Supporting guidelines and templates had been established, enabling a generally consistent approach, and there was a generally effective database of clearing projects and associated records.

Non-compliances were identified within one of the eight projects, associated with administrative issues:

- *Lack of documentation of regard for minimising clearing and its impacts*
- *Lack of planning for, and records of, weed management and monitoring during and after clearing.*

General partial compliance was identified in several areas across all projects, including:

- *Lack of documentation of regard for relevant policies and planning instruments*
- *Incomplete availability and reporting of required records for some projects*
- *Inadequate records of implementation of vegetation management plans and dieback and weed control for some projects.*

Specific findings for each of the eight audited projects have been documented in appended audit tables and summarised in Section 3 of this report.

Eight of the 46 projects that were cleared under CPS 818 in the period 1 January to 31 December 2020 were audited. This included one project from each of the eight Main Roads regions as outlined below:

- South Coast Highway Mead Road Project (Great Southern Region - GSR)
- Indian Ocean Drive (Mid West Gascoyne Region - MWG)
- Coolgardie Esperance Highway Passing Lanes (Goldfields Esperance Region - GER)
- South Western Highway Middleton North Widen and Seal (South West Region - SWR)
- Goomalling Merredin Road Seal Widening (Wheatbelt Region - WBR)
- Broome – Cape Leveque Road Upgrade (Kimberly Region - KIM)
- Karel Avenue Upgrade – Public Transport Authority (PTA) Bus Depot Access (Metropolitan Region - MET)
- Great Northern Highway Material Pit Expansion (Pilbara Region - PIL).

Of the 596 conditions audited, the audit identified 3 non-conformances and 28 opportunities for improvement. Thirty nine observations, which are defined as ‘minor deviations from requirement but otherwise conforming’, were also recorded. The findings identified for each project are outlined in Table 1.

Main Roads endeavours to be fully compliant with all its approval conditions and will undertake preventative actions to avoid future non-conformances and opportunities for improvement being recorded. Although it was not fully compliant with all the conditions of CPS 818 in 2020, it was noted that the majority of the non-compliances and opportunities for improvement were administrative in nature and largely related to the non-documentation of standard “business as usual” actions.

Furthermore, a number of amendments to Main Roads clearing templates, and CPS 818 itself, were made in 2020, with many of the non-conformances and opportunities for improvement being addressed by these amendments.

Table 2 provides a summary of the non-conformances and opportunities for improvement recorded for each region and the proposed corrective and improvement actions to be undertaken.

The success of the corrective and improvement actions will be evident of the results of the 2023 external audit.

Table 1: Summary of Findings of CPS 818 Audit

Project	No. of Conditions Audited					Total*
	Conformance	Observation	Opportunity for Improvement (OFI)	Non-conformance (NCR)	Not applicable	
South Coast Highway Mead Road Project (GSR)	48	7	0	0	20	75
Indian Ocean Drive Widening (MWG)	45	6	2	0	22	75
Coolgardie Esperance Highway Passing Lanes (GER)	25	4	4	0	42	75
South Western Highway Middleton North Widen and Seal (SWR)	35	7	5	0	28	75
Goomalling Merredin Road Seal Widening (WBR)	35	6	2	0	28	71*
Broome – Cape Leveque Road Upgrade (KIM)	21	2	5	0	47	75
Karel Ave Upgrade - PTA Bus Depot Access (MET)	19	4	6	0	46	75
Great Northern Hwy Material Pit Expansion (PIL)	17	3	4	3	48	75
Total	245	39	28	3	281	596

*CPS 818/14 and 818/15 consist of 75 and 71 auditable conditions respectively

Table 2: Corrective and Improvement Actions by Category

Finding Category	Finding	Region	Corrective/Improvement Actions
Inadequate evidence to demonstrate that actions required in accordance with one or more of the conditions of CPS 818 were undertaken to minimise the risk of introduction and spread of weeds during and/or post clearing.	2 NCR 10 OFIs	GER WBR KIM MET PIL	<p>Although undertaken, Main Roads contract documentation previously did not require contractors to submit vehicle hygiene checklists. Main Roads has updated its contract documentation to require contractors to submit completed vehicle hygiene checklists.</p> <p>Main Roads Clearing Desktop Report (CDR) and Clearing Assessment Report (CAR) templates have been updated to specify when post clearing weed monitoring and control is required.</p> <p>To facilitate the submission of evidence, Main Roads is developing a web portal to allow contractors to submit completed checklists and weed spray records online.</p>
Inadequate evidence to demonstrate that regard was given to the principles of avoiding clearing, minimising clearing and reducing the impact of clearing on any environmental value.	1 NCR 2 OFIs	MET PIL	Main Roads CDR and CAR templates have been updated to require details of how the principles of avoid, minimise and reduce the impacts of clearing have been applied to each project.
The provision of inaccurate clearing data and shapefiles to DWER with the CPS 818 annual report.	7 OFIs	MWG GER SW PIL	Main Roads has updated its process for the collation of CPS 818 annual report data, including the requirement for additional data quality checks and the review of all shapefiles by a dedicated GIS resource.
Inconsistency within Assessment Reports as to the permanency of the clearing undertaken and the potential need for revegetation.	3 OFIs	KIM PIL	Main Roads internal review process will ensure revegetation requirements are properly defined in CARs and CDRs.
Lack of an explicit statement of regard for approved policies and relevant planning instruments in the Assessment Reports.	2 OFI's	MET PIL	Main Roads CDR and CAR templates have been updated to require details of how the assessment had regard for any approved policy and relevant planning instrument.
Submissions from stakeholders not included in the Assessment Report, no statement was provided addressing the submissions, assessment not updated to capture the level of variance described in DWER's submission.	2 OFIs	SWR	New processes prescribed in CPS 818/15 require Main Roads to publish a summary of all submissions received and a statement addressing each of these submissions on its website. Main Roads CAR template has been updated to provide additional guidance for seeking and addressing stakeholder submissions.
Although consultation with DWER was undertaken, a submission was not specifically sought from the DWER Branch responsible for drainage and waterways.	1 OFI	SWR	Main Roads CAR template has been updated to provide additional guidance for seeking and addressing stakeholder submissions.
Inadequate evidence to demonstrate that actions required in accordance with the conditions of CPS 818 were undertaken to minimise the risk of introduction and spread of dieback.	1 OFI	MET	<p>Main Roads is developing a web portal for its contractors to submit evidence of site management, including hygiene management.</p> <p>Training modules aimed at project and contract managers are being developed to emphasise the importance of evidence of onsite environmental management actions.</p>