



Kurnell Terminal

Independent Environmental Audit 2026

Ampol

29 March 2026

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Client	Ampol Australia Pty Ltd – Kurnell Terminal
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ABBREVIATIONS

Abbreviation	Description
ACS	Asbestos Contaminated Soil
ACM	Asbestos Containing Material
AECs	Areas of environmental concern
AQMP	Air Quality Management Plan
BWPMP	Biodiversity, Weed and Pest management Plan
CLOR	Caltex Lubricating Oil Refinery
CEM	Community Engagement Manager
Council	Sutherland Shire Council
DPHI	Department of Planning, Housing and Infrastructure (previously the Department of Planning, Industry and Environment – DPIE)
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA	Environment Protection Authority
EPL	Environment Protection Licence
ERP	Emergency Response Plan
FRNSW	Fire and Rescue NSW
IEA	Independent Environmental Audit
IG	Inert Gas
Kurnell Terminal	Kurnell Refinery Conversion Project located at 2 Solander Street, Kurnell, NSW, in the Sutherland Shire Local Government Area
LMS	Learning Management System
LOP	Letter of Protest
LPS	Loss Prevention System
LTEMP	Long Term Environmental Management Plan
MHF	Major Hazard Facility
MOD 1	Modification 1 to the Development Consent for demolition and removal of redundant process refinery units, tanks, pipeways/pipelines and infrastructure, dated 10 August 2015

Abbreviation	Description
MOD 2	Modification 2 to the Development Consent for Asbestos contaminated soils management works, dated 27 October 2017
MOD 3	Modification 3 to the Development Consent for Tank 101 demolition works, dated 17 November 2017
MOD 4	Modification 4 to the Development Consent for an extension of demolition works period, dated 9 August 2018
MOD 5	Modification 5 to the Development Consent for asbestos contaminated soils containment cell, cooling water outlet pipeline and administrative amendments, dated 10 July 2019
MOD 6	Modification 6 to the Development Consent for an extension of the asbestos contaminated soils management works period, dated 21 January 2020
NMP	Noise Management Plan
NPWS	NSW Parks and Wildlife Service
OEMP	Operational Environmental Management Plan
OFI	Opportunity for Improvement
PFAS	Per-and poly-fluoroalkyl substances
PIRMP	Pollution Incident Response Management Plan
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
PRP	Pollution Reduction Program
ROW	Right of Way
SOP	Standard Operating Procedure
SSC	Sutherland Shire Council
SSD-5544	Development Consent SSD-5544
SWMP	Soil and Water Management Plan
the 'audit period'	25 February 2021 to 24 February 2026
TMP	Traffic Management Plan
WMP	Waste Management Plan
WWTP	Wastewater Treatment Plan
VENM	Virgin Excavated Natural Material

EXECUTIVE SUMMARY

Ethos Environmental Pty Ltd (Ethos Environmental) was engaged by Ampol Australia Pty Ltd – Kurnell Terminal (Ampol) to conduct the 2025/2026 Independent Environmental Audit (IEA) of the Kurnell Refinery Conversion Project located at 2 Solander Street, Kurnell, NSW, in the Sutherland Shire Local Government Area (Kurnell Terminal).

The IEA was conducted to address the requirements of Condition D7 of Development Consent SSD-5544 which was granted 7 January 2014 for the conversion of the Kurnell Refinery into a finished product import and distribution terminal.

This is the fourth IEA undertaken under Development Consent SSD-5544 (SSD-5544) and covered the period from 25 February 2021 (date of last audit site inspection) to 24 February 2026 (date of the site inspection associated with this audit). Ampol obtained approval from the Department of Planning, Infrastructure and Housing (DPHI) to delay the audit until 2025.

The IEA process was based on the *Independent Audit: Post Approval Requirements* (DPHI, May 2020), the auditing standard *AS/NZS ISO 19011:2014 Guidelines for Auditing Management Systems* and Ethos Environmental proposal (dated 3 September 2025).

The IEA methodology included:

- Initial correspondence with Ampol to organise the audit, including the provision of key documentation, site visit and timing
- Consultation with key government agencies (DPHI, Environment Protection Authority (EPA), Fire and Rescue NSW and Sutherland Shire Council (SSC))
- Preparation of compliance assessment checklist including the list of Conditions of Consent to be assessed for compliance (SSD-5544) and Environment Protection Licence (EPL) 837
- Site inspection on the 16 February 2026 and follow up visit on 24 February 2026
- Interviews were conducted during the site inspections with site personnel
- Review of documentation provided during the site inspection and additional information provided after the site inspection
- Preparation of a draft IEA report and provision to Ampol to provide additional information and /or correct errors in fact
- Finalisation of the IEA report following receipt of feedback from Ampol

The IEA assessed compliance with SSD-5544 and EPL 837 conditions . A summary of non-compliances is provided in Section 3.3 and a detailed Compliance Table is provided in Appendix A..

A summary of the Kurnell Terminal's overall compliance status is provided in Table ES- 1.

Table ES- 1 Summary of overall compliance status

Approval	No. of Conditions Compliant	No. of Conditions Non-compliant	No. of Conditions Not triggered	No. of Conditions Complete
Development Consent SSD 5544	33	6	5	76
EPL 837	47	6	9	N/A

The scope of the audit included a review of the environmental performance of the site (Section 3.1) and a high-level review of the adequacy of the environmental management plans for the site (Section 3.2). Continuous improvement opportunities were identified and are presented throughout the report.

A summary of recommended actions to improve environmental performance and compliance status is presented in Section 4.

1 INTRODUCTION

1.1 Background

Ethos Environmental Pty Ltd (Ethos Environmental) was commissioned by Ampol Australia Pty Ltd (Ampol) to conduct the 2025/2026 Independent Environmental Audit (IEA) of the Kurnell Refinery Conversion Project located at 2 Solander Street, Kurnell, NSW, in the Sutherland Shire Local Government Area (Kurnell Terminal).

The IEA was conducted to address the requirements of Condition D7 of Development Consent SSD 5544 which was granted on 7 January 2014 for the conversion of the Kurnell Refinery into a finished product import and distribution terminal.

The Kurnell Terminal is a petroleum product import, storage and distribution facility. Ampol import finished products (gasoline, jet fuel and diesel) through two fixed berths at a wharf and an additional sub berth located in Botany Bay. Product is stored on site in tanks and distributed via pipeline under Botany Bay to the Ampol Banksmeadow Terminal for further distribution.

The site was formerly a refinery and completed the final stage of demolishing redundant infrastructure including tanks and the removal of asbestos affected soils from the pipe way and placement in the on-site Asbestos Contaminated Soil (ACS) Containment Cell in February 2021.

This is the fourth IEA undertaken under Development Consent SSD 5544 (SSD-5544).

1.2 Audit scope

The audit was conducted in accordance with the requirements set out in SSD 5544, Condition D7 and Section 3.3 of the Department of Planning, Industry and Environment (now Department of Planning, Housing and Infrastructure - DPHI) *Independent Audit Post Approval Requirements* (DPHI, 2020) as detailed in Table 1.

The scope of the audit included the activities approved under Development Consent SSD 5544 including Modifications (MODs) 1-6 within the approved footprint. The majority of activities associated with the construction and demolition phases of the project were completed in the period 2014 – 2020 and had been completed and assessed in the 2021 IEA. As agreed with DPHI during the audit scope consultation, historical construction and demolition activities completed outside the audit period have not been assessed and verified as part of this IEA.

The audit period was from the 25 February 2021 (date following the previous audit site inspection) to 24 February 2026 (day of follow up site inspection associated with this audit).

Table 1: Audit Scope

Condition	Requirement	Where addressed in this report
SSD 5544, Condition D7,		
D7	Within a year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:	
(a)	be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;	Section 1.3 and Appendix C
(b)	include consultation with the relevant agencies	Section 1.4 and Appendix D
(c)	assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL and/or Water License (including any assessment, plan or program required under these approvals);	Section 3.1, Section 3.3 and Appendix A
(d)	review the adequacy of any approved strategy, plan or program required under these approvals; and	Section 3.2

Condition	Requirement	Where addressed in this report
(e)	recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.	Summarised in Section 4
Note	This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary.	Section 1.3 and Appendix C
DPHI Independent Audit Post Approval Requirements		
Section 3.3	An Independent Audit must include:	
1	An assessment of compliance with:	
(a)	all conditions of consent applicable to the phase of the development that is being audited. Should there be any uncertainty to which conditions are to be audited, the auditor can seek clarification during the consultation as per Section 3.2;	Appendix A and Section 3.3
(b)	all post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans; and	Appendix A and Section 3.2
(c)	all environmental licences and approvals applicable to the development excluding environment protection licences issued under the Protection of the Environment Operations Act 1997.	Appendix A
2	a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:	
(a)	actual impacts compared to predicted impacts documented in the environmental impact assessment;	Appendix A
(b)	the physical extent of the development in comparison with the approved boundary;	Appendix A Condition B2
(c)	incidents, non-compliances and complaints that occurred or were made during the audit period;	Section 3.1
(d)	the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit; and	Section 1.4, Section 3.1 and Appendix D
(e)	feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit period;	Section 1.4
3	the status of implementation of previous Independent Audit findings, recommendations and actions (if any);	Appendix B
4	a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and	Section 3.2
5	any other matters considered relevant by the auditor or the Department, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.	Section 1.4

1.3 Audit team

The audit was conducted by the following qualified, experienced and independent audit team which was endorsed by DPHI (refer Appendix C).

- Helen Onus, Lead Auditor
- Jenny MacMahon, Auditor and Peer Review

Helen Onus and Jenny MacMahon are both registered as Lead Auditors by Exemplar Global and each have over 20 years of environmental auditing / consulting experience.

There was no requirement for the audit team to include technical specialists.

1.4 Audit methodology

The audit scope was developed to meet the requirements of Condition D7, the *Independent Audit Post Approval Requirements* and considering feedback on the scope received during consultation with the relevant agencies (discussed below).

The IEA was undertaken in general accordance with:

- Independent Audit: Post Approval Requirements (DPHI, May 2020)
- AS/NZS ISO 19011:2014 Guidelines for auditing management systems
- Ethos Environmental proposal (dated 3 September 2025)

The IEA methodology included:

- Initial correspondence with Ampol to organise the audit, including the provision of key documentation, site visit and timing
- Consultation with key government agencies as summarised in Table 2. Refer to Appendix D for copies of the correspondence received
- Preparation of compliance assessment checklist including the list of Conditions of Consent to be assessed for compliance (SSD-5544 and EPL 837)
- Site inspection on 16 February 2026 by the Lead Auditor and Peer Reviewer and follow up visit by the Lead Auditor on 24 February 2026
- Interviews were conducted during the site inspections with the following Ampol site personnel:
 - National Environment Manager - Distribution
 - Senior Environment Management Systems Specialist
 - Kurnell Terminal Manager
 - Remediation Specialist
 - Community Engagement Manager
 - Operations Specialist
 - Project Engineer
 - Project Manager, Engineering
- Review of documentation provided during the site inspection and additional information provided after the site inspection
- An assessment of compliance was undertaken by viewing evidence of documents associated with each aspect of the consent and associated plans, programs and strategies, interviews with site personnel and observations made during the site inspection. The Compliance Table included in Appendix A includes evidence reviewed in assessing compliance with each condition. The definitions of compliance status is provided in Table 3 and aligns with the Independent Audit Post Approval Requirements
- Preparation of a draft IEA report and provision to Ampol to provide additional information and /or correct errors in fact
- Finalisation of the IEA report following receipt of feedback from Ampol

Table 2 Summary of consultation with relevant authorities

Agency	Details of consultation	Summary of response and key focus areas	Where addressed
Department of Planning, Housing and Infrastructure (DPHI)	Initial email request for feedback sent by Ethos Environmental on 7 January 2026 Response from DPHI Senior Compliance Officer received on 12 January 2026	Include consultation with Fire and Rescue NSW about audit scope to obtain any feedback on compliance with relevant consent conditions regarding emergency management, fire safety, and incident response.	Fire and Rescue NSW were consulted (refer below)
		Concur that historical construction and demolition activities that were completed outside of this audit period do not need to be assessed and verified. Although audit should verify if actions taken to close out non-compliances that were identified in the previous IEA have been completed.	Close out of previous IEA actions is included in Appendix B
		Audit should note breach with Condition D7 and D8 relating to timing of conducting the IEA.	Appendix A
		The 2025 Hazard Audit listed a number of incidents and near misses in Appendix A, six of which resulted in loss of containment and posed potential environmental harm. Assess whether Ampol Refineries complied with its incident response and reporting obligations under Conditions D3, D5 and D6.	Section 3.1.1 for discussion of incident management and reporting; and Appendix A for assessment of compliance with Conditions D3, D5 and D6
Environment Protection Authority (EPA)	Initial email request for feedback sent by Ethos Environmental on 9 February 2026 Response from EPA Operations Officer received 13 February 2026	Focus on the following aspects: Odour management systems and procedures. Over the years the EPA has received some odour complaints relating to Ampol's activities. Ampol have made a number of improvements, however we still occasionally receive complaints, particularly during periods of rainfall. The most recent complaints were from the night of 17 January 2026.	Refer Section 3.1.4 for discussion of odour management
		Measures in place to mitigate the transport of contaminants offsite via groundwater (hydrocarbons and PFAS)	Refer Section 3.1.7 for discussion of groundwater and contamination management
		Shipping noise is another issue that we sometimes receive complaints about, however Ampol are currently reviewing their management practises as required under Special Condition E21 in the EPL.	Refer Section 3.1.5 for discussion of noise management
		Adequacy of and compliance with site surface water controls and discharges.	Refer Section 3.1.6 for discussion of surface water management

Agency	Details of consultation	Summary of response and key focus areas	Where addressed
<p>Sutherland Shire Council (SSC)</p>	<p>Initial email request for feedback sent by Ethos Environmental on 7 January 2026</p> <p>Follow up email sent on 9 February 2026 and 16 March 2026</p> <p>Response from Sutherland Shire Council Environmental Project Officer provided on 17 March 2026</p>	<p>Q. What has been Council's involvement with the Kurnell Terminal during the audit period?</p> <p>A. Review and approval of Development Applications including remediation of land. Review of DN's. GIPA requests. Discussions around subdivision and divestment of Ampol under-utilised land. Ongoing discussions regarding the cleanup of an oil spill into Mangroves that occurred in April 2022 and the relationship to the mass death of mangroves. Subsequent spill of 1500Lts of fuel onsite in 2024. Approvals to install groundwater monitoring wells within council owned land adjacent to Ampol.</p>	<p>Noted</p>
		<p>Q. Has Council conducted an inspection of the site during the audit period? If so, when was the site last inspected by the Council ?</p> <p>A. Council have conducted site visits in relation to Development Applications and the sub-division proposal. Councils last inspection of limited areas of the site relative to the subject being discussed was June 2024.</p>	<p>Noted</p>
		<p>Q. Are there past or recent compliance issues such as fines, notices, correspondence or enforcement actions you are aware of concerning the site? If so have these been addressed by Ampol?</p> <p>Are there outstanding actions?</p> <p>A. Yes. Unauthorised use of a portion of the site leased to an external company (CBOX) by Caltex without a DA approval between December 2020 and December 2022. After investigations by and discussions with Councils compliance officer, a DA was lodged.</p>	<p>Noted. This has not been considered further as part of this audit as it has been addressed between SSC and the leasee of the land (CBOX).</p>
		<p>Q. Has Council received any community complaints regarding operations at the Kurnell Terminal?</p> <p>Were these satisfactorily addressed?</p> <p>A. Council has received many complaints from the community regarding the oil spill in 2022 and the impacts on mangrove deaths in Quilbray Bay. Other complaints include odours from a Stormwater Drain coming from the Ampol Site and suspected oil film on the water surface in the stormwater drain from Marton Park Wetland which shares a border with Ampol and takes some of its stormwater. The stormwater drain issues were addressed satisfactorily. The oil spill and potential impacts on Mangroves is ongoing and is currently sitting with the EPA.</p>	<p>Noted. Discussion of works on the Wharf Drain is included in Section 3.1.6.</p> <p>Discussion of the mangrove dieback investigation is included in Section 3.1.1.</p>
		<p>Q. Are there any positive comments regarding environmental management at the Kurnell Terminal?</p> <p>A. Ampol is actively cleaning up the site and is happy to share results with Council when requested, and particularly if it can assist with a Council project.</p>	<p>Noted</p>

Agency	Details of consultation	Summary of response and key focus areas	Where addressed
		<p>Q. Are there any areas you would like the independent environmental audit to focus on?</p> <p>A. Ensuring the ongoing environmental improvements at the site to limit potential environmental impacts on the surrounding community are ongoing – including ongoing remediation works and ensuring stormwater and spills are managed onsite. Ensuring that ongoing remediation and management in the area identified for subdivision / divestment will remain with Ampol and is not handed over to a third party through the sale of land.</p>	<p>Noted. Refer Section 3.1 for discussion of environmental performance</p> <p>Issues relating to future subdivision / divestment are outside the scope of this IEA</p>
<p>Fire and Rescue NSW</p>	<p>Initial email request for feedback sent by Ethos Environmental on 9 February 2026</p> <p>Telephone discussion with Superintendent, Manager Fire Safety and follow up email on 11 February 2026</p>	<p>FRNSW have had no involvement in any environmental auditing.</p> <p>FRNSW engagement with the site has primarily been the provision of advice to DPHI via the Major Projects Portal and legislated consultation on Emergency Planning. As such, FRNSW cannot speak to compliance issues related to the site which should be directed to SafeWork as the regulator of Major Hazard Facilities</p>	<p>Noted</p>

Table 3: Performance category assessment definitions

Performance category	Definition
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit
Not Triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant
Complete	The requirement of the condition was completed and assessed outside of the audit period and there are no ongoing requirements associated with this condition. Notwithstanding this, the Condition requirements remains in force.
Opportunity for Improvement (OFI)	The condition was assessed as compliant, and the auditor has identified an opportunity for improvement.

2 KURNELL TERMINAL OPERATIONS

2.1 Site description

The Kurnell Terminal is located on the Kurnell Peninsula, within the Sutherland Shire local Government Area, approximately 15 km south of the Sydney city centre and 4 km south-east of the Sydney Airport (see Figure 1).

Road access to the site is via Solander Street, off Captain Cook Drive. The site is surrounded by residential and industrial land uses and natural features including:

- Kurnell village community immediately to the north and north-west
- Quibray Bay Aquatic Reserve and Towra Point Nature Reserve (a RAMSAR wetland) to the west
- Sydney Desalination Plant and light industrial uses to the south-west and west
- Kamay Botany Bay National Park to the east

The closest sensitive receiver to the site is located approximately 30 m to the north of the site on Cook Street, Kurnell.



Figure 1 Site Location (source SSD 5544 MOD 5 Modification Assessment report)

2.2 Approvals and licences

The major approvals and licences in place for the Kurnell Terminal are summarised in Table 4.

Table 4 Summary of major approvals and licences

Approval / Licence	Date granted	Details
Development Consent SSD 5544	7 January 2014	Conversion of the existing Kurnell Refinery facility into a finished fuel product import and distribution terminal
MOD 1	10 August 2015	Demolition and removal of redundant process refinery units, tanks, pipeways/pipelines and infrastructure
MOD 2	27 October 2017	Asbestos contaminated soils management works
MOD 3	17 November 2017	Tank 101 demolition works
MOD 4	9 August 2018	Extension of demolition works period
MOD 5	10 July 2019	Asbestos contaminated soils containment cell, cooling water outlet pipeline and administrative amendments
MOD 6	21 January 2020	Extension of the asbestos contaminated soils management works period
EPL 837	2 May (anniversary date)	Licences the following Scheduled Activities: <ul style="list-style-type: none"> • Chemical storage • Shipping in bulk

Approval / Licence	Date granted	Details
Major Hazard Facility (MHF) Licence 20 6 96	14 October 2025	Licence to operate Major Hazard Facility Expires 14 October 2030

2.3 Description of site operations

The main operations and activities at the site, wharf and associated pipelines (as described in the OEMP) comprise:

- Receipt and back load of products via the wharf
- Wharf operations and maintenance
- Distribution of products from the site through the pipelines to other Ampol facilities
- Coordinating product movements between the Terminal, Banksmeadow Terminal, Sydney Joint User Hydrant Installation and Sydney Newcastle Pipeline – system is automated
- Transfer of slops via underground pipeline to the wharf for transport by ship to other locations, as needed
- Receipt of slops via underground pipeline from the Banksmeadow Terminal to the onsite storage tanks
- Filling, transferring and delivering product to/from onsite storage tanks via internal pipelines
- Laboratory quality assurance testing (NATA certified) of products on receipt and prior to release to pipeline
- Inspection, monitoring and testing of storage and product transfer equipment, including bulk storage tanks, piping systems and valves, vent systems and devices, emergency shutdown systems, control pumps, and maintenance of all storage and product transfer equipment
- Inspecting vapour lines for compliance
- Maintenance of pipeline Right of Ways (ROWs)
- Vegetation and weed management
- Operation of a jet fuel treating unit to treat off-spec imported jet fuel via sand filters, salt driers and clay filters
- Stormwater management and outfalls at Quibray and Botany Bay
- Oily water system capture, treatment at the Wastewater Treatment Plant (WWTP) and wastewater outfall pipeline through Yena Gap pipeline
- Managing site security (including site entry to Wharf and Terminal and other permits);
- Inventory management and data entry/processing
- Conducting and recording routine inspections and observations
- Regular community consultative meetings and responding to community complaints
- Management of road traffic and people movements on site

2.4 Site inspection observations

Site inspections took place on the 16 and 24 February 2026. On the day of the inspections the weather was mild with low wind speeds. There had been minimal amounts of rain in the days preceding the first inspection.

The auditors were escorted around the site by Ampol personnel who made all areas requested, accessible to the auditors with the exception of areas within the tank farm bunds that require an Ampol Permit to Work to enter.

Table 5 presents photographs of infrastructure observed during the site inspection. Not all areas of the site were able to be photographed as mobile phones were not permitted in high risk areas.

Table 5 Photographs of infrastructure and areas observed during audit site inspection 16 February 2026



Photo No.	Description / comment	
#01	Biosecurity warning sign at Kurnell Wharf	
#02	Spill kits and spill equipment were available at the Kurnell Wharf	


Photo No.	Description / comment	
#03		
#04	<p>Biosecurity waste bins were available at the Kurnell Wharf for ship waste. The ship officers are responsible for unloading the waste. Ampol coordinates the collection of the biosecurity waste by a licensed transporter post the departure of the ship. Ampol reported that the cost of collection and disposal remains the responsibility of the Shipping Agent.</p>	


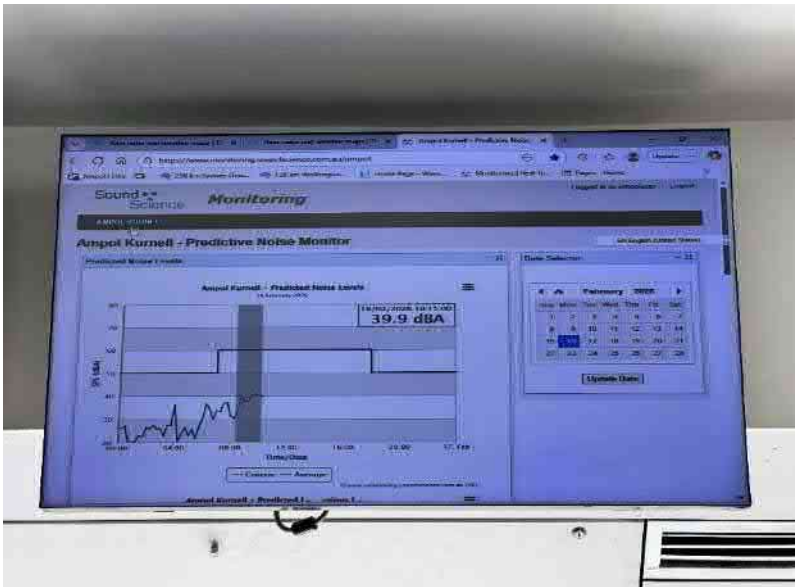
Photo No.	Description / comment	
#05	SoundScience SmartData monitoring system located at the Kurnell Wharf building	
#06	Demonstration of SoundScience provided by Shore Officer. No ships were berthed at the time of the audit site inspection	



Photo No.	Description / comment	
#07	<p>Weighted drain covers to temporarily block / protect stormwater drains to Botany Bay</p>	
#08	<p>Grass observed inside some tank bunds e.g. Tank 512, Tank 105, Tank 104, Tank 103 and Tank 102).</p> <p>Refer Appendix A Condition B16 and 2026 IEA OFI 14</p>	


Photo No.	Description / comment
#09	
#10	



Photo No.	Description / comment	
#11		
#12	New stormwater pit and automated pumping system installed at pipeway B as part of PRP U28	




Photo No.	Description / comment	
#13	ACS Containment Cell (grassed mound) and groundwater monitoring well (EPL Point 28)	 A wide-angle photograph showing a large, grassed mound in the background under a blue sky with scattered clouds. In the foreground, there is a fenced-in area with some sparse vegetation and a red pipe or structure.
#14	Point where pipeline leaves site to discharge to ocean outfall at Yena Gap through Kamay Botany National Park Photo supplied by Ampol on 29/03/2026	 A photograph showing a large, rusted metal pipeline running through a grassy area. The pipeline is partially covered by a large orange tarp. In the background, there is a fence and some trees.

Photo No.	Description / comment	
#15	Recently repaired pipeline elbow at pipeline exit point near the rear gate to the Kamay Botany Bay National Park Photo supplied by Ampol on 29/03/2026	

3 AUDIT FINDINGS

3.1 Environmental Performance

The environmental performance of the Kurnell Terminal was assessed by reviewing regulatory action, incidents and complaints, as well as through site inspection observations (refer Section 2.4) and feedback received from government agencies during consultation (Section 1.4).

3.1.1 Environmental incident management

Ampol uses its Loss Prevention System (LPS) to assist in the management of environmental issues. This includes environmental incidents, near misses and community complaints. Details of environmental incidents are entered into the LPS and this allows for tracking of the investigation, follow up and close out of corrective and preventative actions. The LPS was demonstrated to the auditors during the site inspection and an extract of incidents and near loss incidents provided for the audit period. A review of this extract indicated that the system was well used with a number of minor spills and leaks recorded as well as the more significant incidents.

During the audit period the following five incidents were reported to the EPA as causing or threatening material harm to the environment. Not all of these incidents were reported to DPHI (refer to Appendix A Condition D6).

7 April 2022 WWTP overflow releasing hydrocarbon impacted water into the environment

Following an extreme weather event on the evening of 6 April 2022 and into the early hours of 7 April 2022, heavy rainfall led to floodwaters inundating the WWTP, including the oily water separators, wet oil sump and sludge retention basin and causing the release of hydrocarbon impacted floodwaters into surrounding land, waters and residences.

It was estimated that approximately 9,200 litres of hydrocarbon escaped from the WWTP in floodwaters impacting Marton Park Wetland, Quibray Bay, creeks and stormwater drains along Captain Cook Drive, public spaces, verges and residences along Captain Cook Drive, Solander Street, Bridges Street and Torres Street as well as recreational spaces including Marton Park, Kurnell Girl Guides Hall, Kurnell Recreation Club and the Kurnell Horse Arena paddock.

The incident was considered by the EPA to have caused serious actual, likely and potential harm to the environment and an Enforceable Undertaking was entered into between Ampol and the EPA.

Immediately following the incident, the EPA issued verbal clean up directions to Ampol in consultation with Fire and Rescue NSW requiring an extensive clean-up of the water and land area impacted by the incident. The EPA also directed Ampol to engage an environmental consultancy to undertake ecological assessment of the immediate and long term impact of the incident on the receiving environment. This was formalised through Clean-up Notice 3502297 issued on 8 April 2022.

Ampol completed the actions required by the Clean-up Notice including spill containment, hydrocarbon removal, the engagement of independent experts, and community consultation. It also undertook soil remediation works in impacted areas and provided the results of sampling to the EPA to verify the effectiveness of the incident clean-up. The EPA confirmed by letter dated 8 August 2022 that it was satisfied the incident clean-up works were undertaken in accordance with the Clean-up Notice and closed out the notice.

A further Clean Up Notice (3505381) was issued by the EPA on 16 August 2023 on the suspicions that the 2022 oily water incident polluted a mangrove area in Quibray Bay potentially causing the mangrove dieback observed by a NSW Fisheries Officer in August 2022 and an EPA officer in April 2023. This Clean-Up Notice required Ampol to engage an ecologist to monitor and assess the impact of the incident on mangrove health in the mangrove area in Quibray Bay. Ampol engaged environmental consultants, WSP, to undertake this monitoring and a report was submitted to the EPA in May 2024. The EPA confirmed by letter dated 30 April 2025 that Ampol complied with the Clean-up Notice, however requested continued monitoring of the Quibray Bay mangrove area, Ampol agreed to conduct a limited follow up assessment of the impacted area in the mangroves.

In addition to the immediate clean up following the incident, the EPA included a Pollution Reduction Program (PRP U28) to Ampol's EPL in November 2023 requiring stormwater management system upgrades to prevent a similar incident from recurring. These upgrades were designed to provide upstream retention of stormwater to mitigate the risk of overland flow and flooding of the WWTP and maintain segregation between stormwater and oily water systems at the WWTP. They included:

- Installing a levee wall around the WWTP designed to prevent flooding and hydrocarbon loss of containment during periods of high rainfall (designed for a 1 in 500 year flood event)
- Constructing a new stormwater retention pit at the low point of pipe way A, with an automated pumping system
- Constructing a new stormwater pit at the low point of pipe way B with an automated pumping system
- Installing a new automated pumping station at B1A basin and at the intermediate separators
- Installing new automation controls on the existing pump at MH72 oily water sewer
- Providing the EPA with a procedure outlining the new stormwater systems processes of training, maintenance and procedures during heavy rainfall

The EPA tracked the progress of works associated with PRP U28 with ongoing inspections and monthly updates from Ampol. On 31 October 2025, Ampol sent the EPA a final report confirming the upgrades were commissioned and the new system adequately tested. The EPA was satisfied that PRP U28 was complied with and removed it from the EPL on 20 November 2025.

22 March 2024 pipeline rupture releasing gasoline onsite

A pipeline ruptured on 22 March 2024 while Ampol was preparing to undertake pigging works on the main pipe way causing the release of up to 5,500 L of gasoline. The gasoline did not escape from the premises and was captured into a drainage system and directed to the WWTP for treatment. Three complaints were received by Ampol and four complaints were received by the EPA regarding odours. The EPA issued Ampol with a Show Cause letter and an Official Caution.

In response to the incident, Ampol implemented immediate measures to minimise impacts to the environment and community including washing the spilled gasoline to the WWTP for treatment, applying sand on the impacted area to reduce the potential for odours and applying deodorant around the incident area and around the WWTP. Ampol also sent out a community notification regarding the incident and responded to each resident who made an odour complaint.

As part of the incident investigation, Ampol identified that the pipe failure occurred at a previously unidentified thin / deteriorated section of pipeline. Following the incident Ampol undertook a thorough visual inspection and thickness gauging on above ground piping components, which identified another section of pipeline with the same thin/deteriorated section as the one that failed. Ampol replaced this thin section of pipeline and continued pigging works to assist in identifying further faults within the pipeline system and preventing a recurrence.

5 December 2024 oily sheen from ship POLAR BRIGHT berthed at Kurnell Wharf

In the early morning of 5 December 2024, a sheen was observed by Ampol Shore Officers emanating from the ship, the POLAR BRIGHT. The sheen was caused by unburnt flue gas from diesel combustion that was being discharged from the ship's Inert Gas (IG) system into Botany Bay. It was estimated that a couple of litres of unburnt diesel was released.

Ampol responded to the incident in collaboration with the National Maritime Services (NMS) crew and oil response equipment was deployed. The Port Authority also arrived to assess the sheen and was involved in the response.

A Letter of Protest was provided to the ship captain. The ship departed from Kurnell approximately 2.5 hours after it arrived. Ampol reported that the ship will not be able to return to Kurnell until satisfactory close out of the investigation.

6-13 July 2025 Shipping noise impacts from HAFNIA LARVIK and HAFNIA LILLESAND

Ampol received 30 noise complaints between 6-10 July 2025 relating to two sister ships, the HAFNIA LARVIK and HAFNIA LILLESAND, berthed at the Kurnell Wharf one after another beginning on 6 July 2025.

In response to the noise issues, on 9 July 2025 Ampol made the decision to cease discharging at night until the remaining ship made system changes to reduce noise levels. Ampol has removed the two sister ships from its chartering approvals list and they are not permitted to return to Kurnell Wharf until they undergo system improvements and subsequent review and approval.

The EPA considered the number of complaints received, the multiple exceedances of night-time noise limits and the actions Ampol took in response, and issued Ampol with an Advisory Letter (dated 17 July 2025) as a reminder of its responsibilities to manage noise levels from all activities being undertaken at the Premises and ensure Licence limits are complied with. The EPA included a Special Condition in Ampol's EPL (E4 SC E21) to review shipping noise protocols. Acoustic consultants, RWDI, was approved by the EPA and engaged to conduct the review of shipping noise protocols.

The RWDI Review of Shipping Noise Protocols identified that IG system was the main contributor to tonal noise during cargo discharge operations (specifically the IG blower fans) and that tonal noise would emanate from the IG plant room or the IG pipe work. The Review also looked at protocols and made recommended operational improvements. These included actions specifically related to minimising tonal noise.

The RWDI Review of Shipping Noise Protocols report was submitted to EPA on 13 February 2026. Ampol reported that the EPA requested a follow up meeting on site to discuss the review and that this was planned for March 2026.

27 September 2025 black exhaust from ship FRONT CAPELLA berthed at Kurnell Wharf

On the 27 September 2025 black exhaust was observed from the ship, FRONT CAPELLA, berthed at Kurnell Wharf. Nine complaints were received by Ampol via the community hotline / email system. The cause of the incident was believed to be a valve that had stuck open in the boiler resulting in over rich fuel.

In response to the incident, Ampol immediately contacted the ship and the ship's boiler / steam plant was shut down. Ampol issued a Letter of Protest to the ship, the ship was repaired and departed on 29 September 2025. Ampol reported that Ampol Marine will undertake an incident investigation and that the ship will not be able to return to Kurnell until satisfactory close out of the investigation.

No further actions / requests were made by the EPA following submission of the incident report.

3.1.2 Regulatory action

Enforceable Undertaking 30 August 2023 (WWTP overflow incident 7 April 2022)

Following the 7 April 2022 WWTP overflow incident, Ampol entered into an Enforceable Undertaking with the EPA on 30 August 2023.

The Enforceable Undertaking outlined that the EPA was concerned that the incident constituted the following breaches of the Protection of the Environment Operations Act 1997 (POEO Act):

- Section 120, pollution of waters of Marton Park Wetland, including unmade waterways and downstream to Quibray Bay with hydrocarbon-impacted floodwaters
- Section 142A, pollution of lands at or near Captain Cook Drive, Solander Street, Bridges Street and Torres Street, Kurnell, with hydrocarbon-impacted floodwaters
- Section 152, failure to notify each relevant authority immediately after it became aware of the incident being a pollution incident that threatened and caused material harm to the environment

The Enforceable Undertaking required Ampol to pay \$700,000 to fund the following projects:

- \$200,000 to SSC for the construction of a new children's playground at Marton Park
- \$150,000 to SSC for the construction of new outdoor gym equipment at Marton Park
- \$180,000 to Greater Sydney Landcare to provide an educational program, involving research and water sampling activities in the Kurnell area to local school students
- \$150,000 to National Parks & Wildlife Service (NPWS) to undertake a program to remove invasive weeds and restore native species in the Kamay Botany Bay National Park

Ampol provided the required funding and three of the four projects were completed and final reports provided to the EPA. The NPWS project to regenerate Kamay Botany National Park was ongoing with a variation to the Enforceable Undertaking approving an extension of the timeframe for completion to 31 December 2026.

Official Caution 16 July 2024 (Pipeline rupture incident 22 March 2024)

Following the pipeline rupture on 22 March 2024, the EPA issued Ampol with an Official Caution for the alleged breach of Section 64 of the Act (contravening a licence condition). The EPA believed that Ampol contravened EPL Condition O2.1(a) that requires that all plant and equipment installed at the premises must be maintained in a proper and efficient manner. The EPA believed that Ampol failed to maintain the pipeline in a proper and efficient condition as the thin / deteriorated section where the pipe failure occurred was not identified and rectified prior to the incident. The EPA considered that whilst Ampol had a number of measures in place to maintain its pipelines, these measures were not adequate enough to detect the thin/deteriorated section of the pipeline that led to the gasoline spill.

The EPA also stated that it believed Ampol also committed the following offences in relation to the gasoline spill:

- An alleged breach of Licence condition L6.1, “The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises”, in contravention of section 64 of the Act; and
- An alleged breach of Licence condition O2.1(b) – “All plant and equipment installed at the Premises or used in connection with the licenced activity must be operated in a proper and efficient manner”, in contravention of section 64 of the Act

No further regulatory action for the alleged breaches of Licence Conditions L6.1 and O2.1(b) were taken, as the EPA believed the Official Caution for the alleged breach of Licence Condition O2.1(a) was more appropriate.

3.1.3 Community engagement and complaint management

Community engagement

During the audit period (in August 2022) Ampol appointed employed a dedicated Community Engagement Manager (CEM). The CEM is responsible for coordinating the community engagement initiatives as well as responding to complaints. Community engagement activities implemented during the audit period included:

- Monthly Community Newsletters distributed to Kurnell residents via letterbox drop providing updates on Kurnell Terminal operations.
- Local works notification distributed via designated letterbox drops to targeted residents potentially impacted by works
- Implementation of a Community Notification system (Whisper) in 2022 to provide residents and stakeholders with real time information in the event of an incident at the Kurnell Terminal. The notifications are sent to residents which have registered for the service.
- Establishment of the Kurnell Community Fund in 2022 to provide funding to local groups and organisations in the Kurnell community. The February 2025 Community Update reported that since its inception in 2022, the Ampol Kurnell Community Fund has provided close to \$300,000 with the latest round of project funding going to the Kurnell Public School P&C and the Kurnell Men’s Shed.

Complaint management

Ampol operates the Kurnell Community Hotline (1800 719 669) for the purpose of receiving enquires or complaints from members of the public. Complaints can also be received via email. The Kurnell Community Hotline is listed on the Ampol website and also included on Community Updates with a statement that the community can contact the hotline for enquiries, questions or complaints. The Hotline is answered by an external agency and directed to the relevant Ampol contact.

Complaints were recorded as Near Loss Incidents (NILs) in Ampol’s LPS Database. This includes the date and time of the complaint, the method by which the complaint was made, personal details of the complainant, the nature of the complaint, the action taken in relation to the complaint including any follow up contact with the complainant. The LPS enables Ampol to track completion of actions and close out complaints. In addition to the LPS, the Community Engagement Manager maintains a Community Contact Log Register as an Excel spreadsheet to facilitate complaint reporting including the production of graphs. The LPS was demonstrated to the auditors during the audit site inspection. Extracts of the Community Contact Log register for 2021-2025 and 2026 were also provided.

A summary of the complaints received during the audit period compiled from a review of the information provided on the Ampol website and spot checked against the Community Contact Log register, is presented in Table 6.

Table 6 Summary of complaints received during the audit period (Feb 2021 – Feb 2026)

Year	Odour	Noise	Dust	Water	Air	Other	Total
2021	11	3	0	0	0	4	18
2022	61	1	0	11	0	14	87
2023	22	2	0	1	0	4	31
2024	26	10	0	0	0	3	39
2025	29	37	2	0	11	3	82
2026	2	0	0	0	0	0	2
Total	151	53	2	12	13	28	259

A total of 259 complaints were received during the audit period, 151 (58%) relating to odour and 53 (21%) relating to noise. 2022 and 2025 recorded the highest number of complaints. This correlated with the April 2022 WWTP overflow incident and the 2025 shipping noise incident described in Section 3.1.1 above.

Odour continues to be an issue for the community with 29 complaints received in 2025. Ampol has implemented a number of odour abatement measures as required by Special Conditions included in the EPL. This is discussed further in Section 3.1.4.

Noise management is discussed further in Section 3.1.5.

The review of the Community Contact Log registers provided for the audit period indicated that community complaints were being investigated, complainants responded to and closed out.

3.1.4 Odour management

Activities with the potential to generate odours include: Volatile Organic Compounds (VOCs) and /or odours from tank water draw tanks, operation of the WWTP, odorous stockpiles, dewatering of sludges, movement / excavation of potentially contaminated soil and hydrocarbon spills.

As reported in Section 3.1.3, during the audit period, Ampol recorded 151 complaints of odours. Not including 2022 which had an unusually high number of complaints relating to the April 2022 WWTP overflow incident, Ampol averaged 22 odour complaints per year. Ampol reported that it typically receives odour complaints after periods of significant rain, as bunds, basins and drains are filled with water. The operation of the WWTP was also identified as a source of odour.

In February 2023, the EPA conducted an odour survey in Kurnell in response to community complaints of odours. During the survey EPA officers identified hydrocarbon-like odours on the corner of Solander Street and Captain Cook Drive. The EPA officers also inspected the Ampol premises and detected the same hydrocarbon-like odours around the WWTP in an area adjacent to Solander Street and Captain Cook Drive. Following this inspection and discussions with Ampol, the EPA included Special Condition E4 (SC E18: *Wastewater Treatment Plant – Odour Reduction Program*) to the EPL in April 2023 which required the installation of activated carbon filters on the top of exhaust pipes at the separators in the WWTP area and a cover over pit MH72. These were installed by Ampol in September 2023.

In 2024 Ampol explored replacing the carbon filters with an odour abatement system which uses negative pressure to draw vapours from the separator pits for treatment through a carbon scrubber before being released to the atmosphere. This was installed and commissioned in March 2025 (in accordance with SC E19: *Wastewater Treatment Plant – Odour Abatement Program*), however Ampol reported that the carbon scrubbers were becoming saturated within two weeks of operation because the negative pressure was drawing greater amounts of vapour from the oily water separators than expected. Ampol reverted back to the previous WWTP odour mitigation method of using passive ventilation in conjunction with carbon filters. The EPA removed SC E19 from the licence in November 2025 but noted that odour management may be revisited if further issues arise.

In addition to the WWTP odour abatement described above, Ampol implemented the following odour minimisation / management measures during the audit period:

- VapourGard odour abatement system installed at the WWTP and at the northern gasoline tanks (100's series tanks). The system works to neutralise odours by moving air across a tank of deodoriser to create a dry vapour. The VapourGard system was observed to be in operation during the audit site inspection. Interviews with the Operations Specialist at the WWTP reported that odours have significantly decreased with the operation of the VapourGard system.
- Covers were installed on the retention basin at the WWTP (observed during audit site inspection).
- Instrumentation (Coriolis meter) was installed on water draw outlets of Tanks 102, 103 and 104 to minimise hydrocarbon release during tank water draws.
- Repairs were completed on the oily water sewer at Tanks 102, 103 and 104 to mitigate the potential for hydrocarbon overflow into bunds and potentially generating odour.
- Oily water sewer systems are reportedly inspected at regular intervals minimising silting of sewer drains and pits.
- Odour surveys were conducted daily at four locations around the WWTP representing the nearest residences at Solander Street, Recreational Club, South and East.

During the audit site inspection on the 16 and 24 February 2026, operations were not perceived to be odorous. A very mild odour was perceived at the WWTP. Ampol has made a number of improvements during the audit period to address odours and it is considered that this issue is being managed in consultation with the EPA.

3.1.5 Noise management

The key potential noise sources for the site are Wharf operations, specifically during shipping and product discharging activities at the fixed berths, maintenance of wharf infrastructure, fans, motors and pumps on Terminal plant and equipment, mixers on some storage tanks and larger vehicles entering and leaving the Terminal. Noise may also be generated from remediation projects and construction and maintenance projects.

The Development Consent (Condition C17) and EPL (Condition L5.1) include the following noise limits (Table 7).

Table 7 Operational Noise Limits

Location	Day	Evening	Night	
	L _{Aeq} (15 min)	L _{Aeq} (15 min)	L _{Aeq} (15 min)	L _{Amax}
At any private residential receiver	60 dB(A)	50 dB(A)	50 dB(A)	55 dB(A)

Noise from the premises is measured at the Wharf using the SoundScience SmartData noise monitoring system which was developed by noise consultants Wilkinson Murray in consultation with the EPA in 2018. This system continuously records noise levels, audio and meteorological data and predicts real-time noise levels at the six identified residential receivers. The SoundScience system was observed during the audit site inspection and the Shore Officer explained how the system is used.

During the audit period, Ampol reported multiple exceedances of its night-time noise limits. These were all due to shipping noise at the Wharf. Ampol also received 53 complaints relating to noise. As previously discussed, the majority of these complaints were received over the period 6-13 July 2025 and related to the two sister ships, the HAFNIA LARVIK and HAFNIA LILLESAND, that were berthed at the Kurnell Wharf. A breakdown of the number of occasions the noise limits were exceeded by year and the number of noise complaints received is presented in Figure 2 .

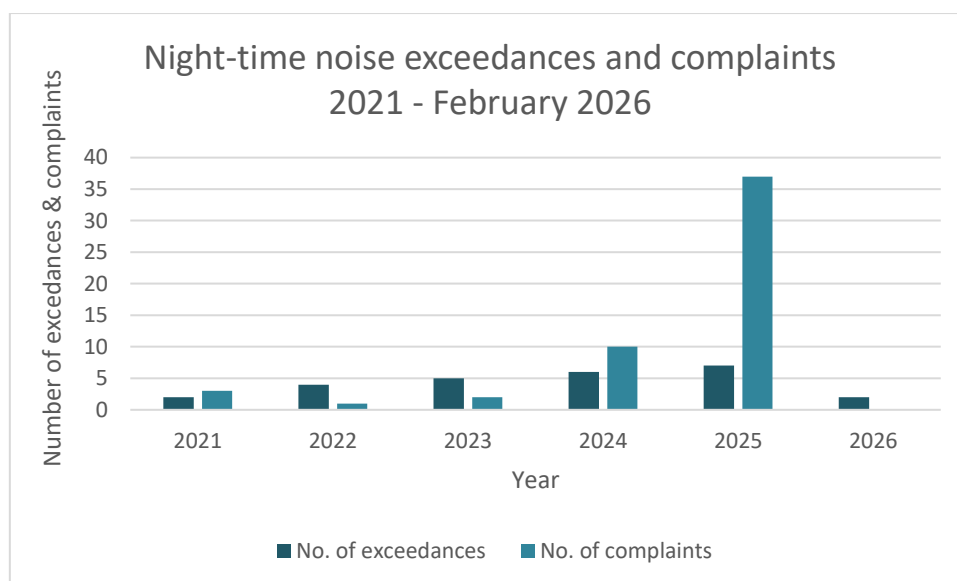


Figure 2 Night-time noise exceedances (2021-Feb 2026)

The noise complaints received in 2024 and 2025 described a high-pitched tonal noise rather than the conventional low-frequency / broadband noise that was sometimes audible from unloading ships. As discussed in Section 3.1.1 Ampol engaged acoustic consultants, RWDI, to investigate the source of the tonal noise. RWDI undertook detailed inspections and monitoring of the following ships:

- HAFNIA LARVIK, 15 August 2025
- PROTEUS STEPHANIE, 30 October 2025
- PROTEUS BOHEMIA, 1 December 2025
- ATLANTIC PEARL 22 and 23 January 2026

From these inspections and monitoring RWDI concluded that the source of the noise was related to the Inert Gas (IG) system and the tonal noise would normally emanate from the IG plant room or the IG pipe work connecting the dans to the deck seal. RWDI also found that the IG system pressure and subsequent gas flow rates to the deck seal are key factors in controlling the amplitude of tonal noise and that reducing the target pressure resulted in meaningful reductions in tonal noise. Lagging the external IG pipework, deck seal and makeshift hood around the IG relief outlet with temporary noise barriers (such as Echo Barrier) also provides meaningful reductions in tonal noise when these were identified as sources.

RWDI also reviewed Ampol's existing protocols relating to shipping noise. These include:

- Prior to arrival, ships are reviewed as part of ship 'clearance' process. Records of previous visits to Kurnell are checked to identify if there were any issues, including noise exceedances or complaints.
- Ships are provided with a Noise Management Letter. The letter provides the noise limits and lists the minimum measures expected to be implemented to minimise noise whilst ships are berthed at the Wharf. The letter outlines that a Noise Management Plan is required to be prepared by the ship captain and submitted to the Terminal prior to berthing.
- Whilst at berth, the Shore Officer inspects the ship on arrival and reminds crew of noise requirements.
- Ampol monitors real-time noise using the SoundScience SmartData noise monitoring system. Since 2024, ships have been provided with a Wi-Fi box that allows the ship captain to log onto SoundScience so that they can also monitor noise levels while they are berthed at Kurnell.
- If noise exceedances occur, Ampol requests the ship to take immediate steps to reduce noise. These may include:
 - requesting the ship to shut down any non-essential equipment;
 - reducing discharge pressure; and / or
 - reviewing noise mitigation measures.
- If the noise limit is exceeded then a Letter of Protest (LOP) is issued to the ship captain. If two LOPs are issued to a ship, Ampol can consider actions to prevent the return of the ship until notable improvements can be shown.

- If noise exceedances continue or community complaints continue despite ongoing mitigation measures, the Terminal Manager may consider ceasing discharge.

Lessons learnt from the RWDI investigations were incorporated into Ampol's protocols. In particular, additional mitigation measures were required and included in ship Noise Management Plans for tonal noise sources (such as the installation of echo barriers around blower room, IG system pipelines and deck seals, pump room exhaust fans).

The RWDI Review of Shipping Noise Protocols report was submitted to the EPA on 13 February 2026 as required by Special Condition E4 (SC E21 *Review of Shipping Noise Protocols*). The report included a number of recommended operational improvements. Ampol reported that it met with the EPA on site on 19 March 2026 to discuss the findings of the RWDI report and tour the Wharf. .

No exceedances were recorded of noise limits relating to other activities. Some noise complaints were received in 2025 from activities at the ROW. This area was used as a laydown area for contractors undertaking projects. Ampol responded to each complaint and made adjustments to work processes where possible to minimise noise impacts.

3.1.6 Surface water management

Ampol is required by the Development Consent (Condition C10) and its EPL (Condition L1.1) to comply with Section 120 of the POEO Act which prohibits the pollution of waters, except as expressly provided by the EPL. Ampol's EPL includes concentration limits for discharges from EPL Point 2 for the following pollutants: arsenic, biological oxygen demand, lead, nickel, nitrogen, oil and grease, phenols, polycyclic aromatic hydrocarbons, total suspended solids, pH and temperature.

Stormwater generated on the site is collected in the site's stormwater system, treated where necessary and discharged off-site to three receiving bodies, Marton Park Wetland, Quibray Bay and Botany Bay. The stormwater system incorporates various retention, retarding and treatment systems and includes provision for the isolation of drainage in pipeways and basins and redirecting to the site's oily water sewer system.

Process water and stormwater from areas of the site where there is potential for interaction of water flows with petroleum products (such as tank bunds and former refinery process areas yet to be remediated) are collected in the site's oily water sewer system and transferred to the WWTP. Treated water from the WWTP is discharged to the submerged ocean outfall at Yena Gap (EPL Point 2).

Whilst the above systems are designed to separate stormwater from oily water and prevent discharges of oily water from site, an extreme weather event in April 2022 caused oily water to be released from the site causing pollution of waters and pollution of lands. This was discussed in detail in Section 3.1.1 and 3.1.2.

Ampol implemented significant upgrades to its stormwater management system to prevent flooding of the WWTP and the offsite migration of oily water during heavy rainfall. These upgrades were required by PRP U28 *Stormwater Management System Upgrade* included within the site's EPL following the April 2022 incident. The upgrades were completed in 2025 and PRP U28 was removed and added to the completed programs under EPL Condition G3.1 in November 2025.

Improvements were also made to a section of the stormwater system upstream of the triple interceptor that was identified as damaged and causing hydrocarbon contamination to enter the stormwater system. This was identified through an investigation undertaken as a PRP included in the EPL in May 2022 (PRP U26 *Hydrocarbon Monitoring*) following the receipt of a number of complaints relating to the stormwater drain adjacent to the Ampol wharf on Silver Beach (Wharf Drain). PRP U27 *Stormwater Pipe Investigations and Rectifications* was included in the EPL in October 2023 to undertake the repair works. These works were undertaken in 2024 and a report provided to the EPA in March 2025 which included hydrocarbon monitoring data that showed concentrations within the stormwater drain had reduced significantly since the repair work. The EPA was satisfied that PRP U27 was complied with and removed it from the EPL and added it to the completed programs under EPL Condition G3.1 in November 2025.

Other than the incidents discussed in 3.1.1, a review of the EPA Annual Returns and the Annual Reviews did not identify exceedances of the limits specified in the EPL for discharges to water at the licensed discharge point.

3.1.7 Groundwater and contamination management

The Kurnell Terminal site has been declared as a “significantly contaminated land” under the NSW Contaminated Lands Management Act 1997. In consultation with the EPA, Ampol has developed the Kurnell Remediation Action Strategy (RAS) for the management and / or remediation of contamination identified at the Kurnell Terminal. The RAS identified a number of areas of environmental concern (AECs) categorised into three broad categories based on the primary contaminant(s) of concern:

1. Land contamination areas. Comprises areas of the site where refinery operations have resulted in soil and /or groundwater contamination.
2. Asbestos impacted areas. Comprises areas where asbestos is the primary contaminant of concern and has impacted soil or has been covered to mitigate exposure.
3. Waste management areas. Areas are located in the southeastern areas of the site and were used for management of refinery waste.

The identified AECs were risk weighted to determine the remediation priority and a timeframe presented for the proposed commencement time for remediation works in each area. Ampol provides an annual report to the EPA (as required by Special Condition E1 SC E16 *Remediation Action Strategy*) providing an update on the progress of remediation works detailed in the RAS.

The most recent report provided in November 2025 indicated remediation works had been completed in a number of areas and was progressing in others (refer Table 8).

Table 8 RAS works status update November 2025

Area	Impact	Status 30-Nov-25
LPG Garden Area, Laboratory, Main Pipeway (north) Area D, Pipe Track A – Area I LPG Area, CLOR Warehouse, Building Waste, RPIP, Geobag Areas, CLOR Tankfarm, Eastern Tank Farm, Northern Tank Farm	Asbestos	Completed
CLOR Process Unit Area	Hydrocarbons / LNAPL	Completed
Northern Process Unit Area, CLOR Pipeway – Area Y	Hydrocarbons	Completed
CLOR Landfarm	Hydrocarbon and Asbestos	Remediation completed, revegetation in-progress
North Western Tank Farm, Scrap Yard,	Asbestos	In-progress
North Western Tank Farm, Northern Tank Farm, Eastern Tank Farm	Hydrocarbons / LNAPL	In-progress
Concarb Pipeway	Hydrocarbon and Asbestos	In-progress

Some of the remediation work required Development Approval from SSC and Ampol reported this was being sought prior to remediation works taking place.

Groundwater monitoring is required at four locations by EPL 837. Points 15 and 16 are located in the bioremediation plot and Points 28 and 29 in the asbestos contaminated soil containment cell. Quarterly monitoring is required to include the following pollutants: benzene, ethyl benzene, lead, toluene, total phenolics, total recoverable hydrocarbons, xylene, mercury, naphthalene and polycyclic aromatic hydrocarbons, however concentration limits are not specified.

In addition to the monitoring required by its EPL, quarterly groundwater monitoring is also undertaken of the sitewide well network and each monitoring zone assessed against active monitoring triggers which were developed with respect to the potential receptors of migrating or discharging groundwater identified in the conceptual site models developed for the site. The quarterly monitoring report prepared by WSP presents the groundwater monitoring results for each area and whether the active monitoring triggers were activated, an assessment of the significance of any active monitoring trigger and any recommended actions.

The Q2 May 2025 Quarterly Groundwater Monitoring report assessed that active monitoring triggers were of low significance with respect to the monitoring trigger plan.

Per-and poly-fluoroalkyl substances (PFAS)

Since 2017, Ampol has undertaken various investigations to assess PFAS at the site as required by Special Conditions included EPL 837.

In April 2024, Ampol provided the EPA with a PFAS 2022-2023 Investigation Summary Report in accordance with EPL 837 Special Condition SC E15 *PFAS Sampling and Analysis Quality Plan*. The report showed that in general PFAS flux and offsite risk to receptors appeared to remain similar or lower when compared to previous years, with some exceptions. Generally, PFAS concentrations were either close to or below the adopted human health and species protection criteria, although there were some results above the criteria.

The EPA considered that PFAS contamination at the premises remains a potential risk to nearby receptors and requires ongoing monitoring. SC E15 was removed from the EPL and added to the completed programs under Condition G3.1a new Special Condition SC E20 *PFAS Risk Monitoring and Remediation Works* included in October 2024. SC E20 requires Ampol to continue monitoring PFAS exposure risks to receptors, and report to the EPA if the risk profile changes. It also requires Ampol to provide updates to the EPA on all PFAS remediation and disposal works.

Ampol engaged WSP to undertake the annual sampling commencing in 2025. An email from WSP confirmed that the 2025 PFAS monitoring program was successfully completed in November 2025 and that WSP was finalising the 2025 Summary report for submission to the EPA in March 2026. It also stated that the 2026 PFAS monitoring was underway with the Q1 2026 sampling event completed on in March 2026.

3.2 Review of Environmental Management Plans

As required by Condition D7 and the *Independent Audit Post Approval Requirements*, the audit scope included a high-level review of the Environmental Management Plans and sub plans.. The auditor did not undertake a technical or detailed assessment of these management plans.

The following management plans were reviewed:

- Operational Environmental Management Plan (OEMP)
- Soil and Water Management Plan (SWMP) (Development Consent Condition C12)
- Noise Management Plan (NMP) (Development Consent Condition C22)
- Air Quality Management Plan (AQMP)
- Traffic Management Plan (TMP) (Development Consent Condition C36)
- Waste Management Plan (WMP)(Development Consent Condition C40)
- Biodiversity, Weed and Pest Management Plan (BWPMP) (Development Consent Condition C42)
- Asbestos Contaminated Soil (ACM) Containment Cell Long Term Environmental Management Plan (LTEMP) (Development Consent Condition C53)

3.2.1 Operational Environmental Management Plan

The OEMP was revised and submitted to DPHI in February 2026.

The OEMP has been structured to meet the requirements of Development Consent Condition D2, ensure compliance with operational elements of the site's EPL and meet the requirements of the Ampol Operational Excellence Management Systems (OEMS) and ISO14001:2015 Environmental Management Systems ((EMS) requirements.

The OEMP includes the following Terminal Management Sub-Plans as Appendix J:

- Soil and Water Management Plan (SWMP)
- Noise Management Plan (NMP)
- Air Quality Management Plan (AQMP)
- Traffic Management Plan (TMP)
- Waste Management Plan (WMP)
- Biodiversity, Weed and Pest Management Plan (BWPMP)
- Asbestos Contaminated Soil (ACM) Containment Cell Long Term Environmental Management Plan (LTEMP)

In general, the OEMP was considered to address the requirements of Development Consent Condition D2.

The following opportunities for improvement have been identified relating to the OEMP:

2026 IEA OFI 01: Update the OEMP to include the role of the Community Engagement Manager. This includes Section 5.3 Environmental Roles and Responsibilities and Section 5.6 Community Concerns and Complaints.

2026 IEA REC 01: Update Section 7.7 of the OEMP to specifically address the requirements of Development Consent Condition D5 for review of management plans and programs and implement.

2026 IEA OFI 02: Update site figure in Appendix A of the OEMP 'Caltex Terminal Operational Boundary' to reflect that the Western ROW is no longer owned by Ampol and within its operational control.

3.2.2 Soil and Water Management Plan

The SWMP was updated in February 2026 to reflect the upgrades made to the stormwater system in 2025. The SWMP is considered to address the requirements of Development Consent Condition C12.

3.2.3 Noise Management Plan

The NMP was revised in 2026 as part of the OEMP review. The NMP is considered to address the requirements of Development Consent Condition C22 .

The following opportunities for improvement have been identified relating to the NMP:

2026 IEA OFI 03: Update NMP to include measures for the minimisation of tonal noise from ship systems and specifically the Inert Gas system.

2026 IEA OFI 04: Update the NMP to clearly describe how to assess compliance with noise limits for non-shipping relating activities (for example during the day). The Annual Review states that "During the initial stage of undertaking any high noise generating activities, and during where needed e.g. grit blasting (paint removal) in proximity (100m) to a specified residential receiver (R1-R8), noise measurement and monitoring will be carried out." This information is missing from the NMP .

2026 IEA OFI 05: The NMP states that reporting to the EPA and DPHI will occur via email when ship noise output is assessed via SoundScience to exceed noise limits and when complaints are received relating to shipping activities. It is understood that DPHI confirmed that it no longer requires Ampol to notify it of ship night-time noise exceedances. Update the NMP to reflect current practices of notifying the EPA only.

2026 IEA OFI 06: The NMP discusses incident management and states that noise complaints will be logged and tracked in the LPS, however it is not clear whether exceedances of noise limits are also logged in the LPS. Update the NMP to describe how noise exceedances will be recorded.

3.2.4 Air Quality Management Plan

The AQMP was revised in 2026 as part of the OEMP review. In general, the AQMP is considered adequate, however, the following opportunities for improvement have been identified.

The AQMP has objectives to minimise energy use and minimise greenhouse gas emissions, however no measures are identified for how this will be achieved (refer Appendix A, Development Consent Condition C35).

2026 IEA OFI 07: Identify measures to minimise energy use and greenhouse gas emissions at the Kurnell Terminal in alignment with the broader Ampol sustainability goals and document within the OEMP / AQMP. Include discussion of implementation of these measures within Annual Reviews submitted to DPHI.

Whilst the OEMP (Section 2.5.8.1 Oily Water) discusses the odour abatement improvements implemented at the WWTP and 100 series tank bunds (installation of VapourGard system and activated carbon filters at the separator exhaust pipes), these are not discussed in the AQMP. The AQMP does not include 'Actions' for the 'Aspect' of operation of the WWTP which is identified as a source of odour.

2026 IEA OFI 08: Update the AQMP to include control measures relating to odour from the WWTP including the odour abatement systems implemented by Ampol in 2024 / 2025.

3.2.5 Traffic Management Plan

The TMP was revised in 2026 as part of the OEMP review. The TMP is considered to address the requirements of Development Consent Condition C36.

3.2.6 Waste Management Plan

The WMP was revised in 2026 as part of the OEMP review. The WMP is considered to address the requirements of Development Consent Condition C40.

The following opportunities for improvement have been identified relating to the WMP.

2026 IEA OFI 09: Update the WMP to include the following waste streams, their classification and management strategies: activated carbon filters from WWTP, waste sand, salt and clay from the Jet Fuel Treating Unit, fire-fighting foam (PFAS and non-PFAS).

3.2.7 Biodiversity, Weed and Pest Management Plan

The BWPMP was revised in 2026 as part of the OEMP review. The BWPMP is considered to address the requirements of Development Consent Condition C42.

The following opportunities for improvement have been identified relating to the BWPMP.

2026 IEA OFI 10: Include within the BWPMP the program for undertaking weed management across the site. Pesticide application and pesticide use training and record keeping is discussed but not the timing, frequency, location and type of weed management activities. The weed program can be a separate document that is referred to in the BWPMP.

2026 IEA OFI 11: Update the BWPMP to include the measures implemented by Ampol for managing feral animals and pests.

2026 IEA OFI 12: Include within the BWPMP the requirement for trimming vegetation along the Yena Gap pipeline in Kamay Botany Bay National Park and the approvals and requirements for undertaking this clearing work.

3.2.8 Asbestos Contaminated Soil Containment Cell Long Term Environmental Management Plan

The Asbestos Contaminated Soil (ACM) Containment Cell Long Term Environmental Management Plan (LTEMP) was revised in 2026 as part of the OEMP review. The ACM LTEMP is considered to address the requirements of Development Consent Condition C53.

3.3 Non-compliances

The compliance assessment against SSD-5544 and EPL 837 conditions is presented in **Appendix A** and includes evidence sighted relevant to each condition.

Non-compliant SSD-5544 conditions are summarised in Table 9

Non-compliant EPL 837 conditions are summarised in Table 10.

Table 9 SSD 5544 conditions assessed as non-compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
C10	The Development shall comply with section 120 of the Protection of the Environment Operations Act 1997, which prohibits the pollution of waters, except as expressly provided in an EPL.	<p>Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025</p> <p>Annual Reviews 2021 - 2025</p> <p>EPA Clean Up Notice (3502297) 8/04/2022</p> <p>EPA letter dated 8/08/2025 re Clean Up Notice 3502297</p> <p>EPA Clean Up Notice (3505381) 16/08/2023</p> <p>EPA letter dated 30/04/2025 re Clean Up Notice 3505381</p> <p>Enforceable Undertaking 30/08/2023 Variation of Enforceable Undertaking to extend project deliverable timeframes 24/02/2025</p> <p>Greater Sydney Landcare Final Report to Ampol re Streamwatch program 2026</p> <p>SCC Final Report to Ampol re completion of Marton Park projects 29/01/2026</p> <p>Environmental Incidents March 2021 – Feb 2022</p>	<p>Ampol reported it was non-compliant against this condition in its 2021-2022 Annual Return and its 2022 Annual Review based on an oily-water overflow incident that occurred on 7/04/2022 that impacted waterways, wetlands and surrounding land in Kurnell.</p> <p>The EPA issued Ampol with a Clean Up Notice on 8/04/2022 specifying immediate clean up actions. These were completed by Ampol and the Clean Up Notice considered closed by the EPA by letter dated 8/08/2022. Ampol also entered into an Enforceable Undertaking with the EPA which required it to fund four community projects to a total of \$700,000. Ampol provided the required funding and three of the four projects were completed and final reports provided to the EPA. The NPWS project to regenerate Kamay Botany National Park was ongoing with a variation to the Enforceable Undertaking approving an extension of the timeframe for completion to 31/12/2026.</p> <p>A further Clean Up Notice was issued by the EPA on 16/08/2023 on the suspicions that the oily water incident polluted the Mangrove Area potentially causing the observed mangrove dieback. This Clean-Up Notice required Ampol to engage an ecologist to monitor and assess the impact of the incident on mangrove health in the Mangrove Area. This was undertaken by environmental consultants WSP and a report submitted to the EPA on 23/05/2024. The EPA stated by letter dated 30/04/2025 that it reviewed the report and additional information requested and concluded that Ampol complied with the Clean Up Notice.</p> <p>The EPA requested continued monitoring of the Mangrove Area, Ampol agreed to conduct a limited follow up assessment of the impacted area in the mangroves.</p> <p>A further incident was reported to the EPA relating to an oily sheen emanating from a ship (POLAR BRIGHT) berthed at the Kurnell Wharf. This incident could be considered to have caused pollution of waters, however the source of the pollution was the ship and not Ampol infrastructure. Following submission of the incident report to the EPA, no further requests / actions were taken.</p> <p>Ampol demonstrated its LPS system to the auditors. The LPS is used for the recording and tracking of incidents. An extract was provided of loss and near loss incidents for the Kurnell Terminal for the period. A review of this extract did not identify other incidents that may have caused pollution of waters. Refer to this IEA report Section 3.1.2 for further discussion of incidents.</p> <p>A review of the EPA Annual Returns and the Annual Reviews did not identify any exceedances of the limits specified in the EPL for discharges to water at the licensed discharge point. Refer to EPL Condition L3.4.</p> <p>Based on the incident which occurred on 7/04/2022 and caused the pollution of waters, this condition has been assessed as non-compliant. However, as clean-up actions have been completed and further improvements made to the wastewater treatment system, no recommendations are made.</p>	Non-compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations										
C17	<p>The Applicant shall ensure that the operational noise generated by the Development does not exceed the Criteria for residential receivers are summarised in Table 3 below:</p> <p>Table 3: Operational Noise Limits dB(A)</p> <table border="1"> <thead> <tr> <th>Location</th> <th>Day L_{Aeq} (15min)</th> <th>Evening L_{Aeq} (15min)</th> <th>Night L_{Aeq} (15min)</th> <th>Night L_{Amax}</th> </tr> </thead> <tbody> <tr> <td>At any private residential receiver</td> <td>60</td> <td>50</td> <td>50</td> <td>55</td> </tr> </tbody> </table> <p>Notes:</p> <ul style="list-style-type: none"> To identify a residential receiver location, refer to Appendix F of the EIS Noise generated by the Development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy These criteria have been developed for this specific Development; however it is recognised that the site is zoned for heavy industrial purpose and that ultimately the amenity of the area should be controlled by the criteria contained in Table 2.1 of the Industrial Noise Policy. 	Location	Day L _{Aeq} (15min)	Evening L _{Aeq} (15min)	Night L _{Aeq} (15min)	Night L _{Amax}	At any private residential receiver	60	50	50	55	<p>Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025</p> <p>2021-2025 Annual Reviews</p> <p>Demonstration of SoundScience monitoring system at Wharf</p> <p>Email to EPA dated 22/12/2025 re shipping noise exceedance</p> <p>Email to EPA dated 4/12/2025 re noise complaint and shipping noise exceedance</p> <p>Email to EPA dated 25/07/2025 re shipping noise exceedance</p>	<p>Noise exceedances are identified through the SoundScience 'SmartData' monitoring system installed at the wharf which continuously monitors and records noise levels, audio and coinciding meteorological data. The system uses the measured wharf noise levels and meteorological conditions to predict real-time noise levels at the six residential receivers located on Prince Charise Parade, Kurnell. The SoundScience system was observed during the audit site inspection, and the Shore Officer explained how the system is used.</p> <p>Ampol reported exceedances of the night-time noise limits due to shipping noise in its Annual Reviews and Annual Returns to the EPA. The following exceedances were reported:</p> <ul style="list-style-type: none"> 2 occasions in 2021 4 occasions in 2022 5 occasions in 2023 6 occasions in 2024 7 occasions in 2025 <p>In addition, exceedances have been recorded on two occasions in 2026 (January and February).</p> <p>The noise exceedances were reported to the EPA via email. Ampol reported that it ceased notifying DPHI of noise exceedances in 2022 following correspondence from DPHI that notification was no longer required.</p> <p>The exceedances reported in 2025 coincided with a large number of community complaints that related to excessive noise from two sister ships that were berthed one after the other at the Kurnell Wharf in July 2025. In response to the complaints, the EPA included a special condition which requires the review of shipping noise protocols. Refer to EPL Condition E4 (SC E21: Review of Shipping Noise Protocols) for further details.</p> <p>Ampol has implemented a range of measures to reduce impacts from shipping noise (discussed in this IEA report Section 3.1) and is complying with the requirements of the EPA to review shipping noise.</p> <p>Based on the exceedances recorded, this condition has been assessed as non-compliant, however given the measures implemented by Ampol and that the EPA is reviewing the issue and may implement further licence conditions regarding noise management, no recommendations are made.</p>	Non-compliant
Location	Day L _{Aeq} (15min)	Evening L _{Aeq} (15min)	Night L _{Aeq} (15min)	Night L _{Amax}										
At any private residential receiver	60	50	50	55										

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
C26	The Applicant shall not cause or permit the emission of offensive odours from the site, as defined under Section 129 of the POEO Act.	Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025	<p>Ampol received 151 complaints relating to odour during the audit period (these are discussed further in this IEA report Section 3.1). Based on the number of complaints received, Ampol reported it was non-compliant with this requirement in its Annual Returns to the EPA in 2021-2022, 2022-2023, 2023-2024 and 2024-2025.</p> <p>In response, Ampol implemented a number of measures to reduce odour impacts from its operations. This included implementing a Wastewater Treatment Plant Odour Abatement Program included as EPL Special Condition (SC E19) which was considered completed and moved to the completed programs under EPL Condition G3.1 by the EPA in November 2025. The EPA noted that it may revisit SC E19 should further works be required to limit odours.</p> <p>Based on the measures implemented by Ampol to address odour in consultation with the EPA, no recommendations are made as part of this audit.</p> <p>Refer to this IEA report Section 3.1 for further discussion of odour and complaints.</p>	Non-compliant
D5	<p>Within three months of:</p> <p>(a) an approval of a modification;</p> <p>(b) a submission of an incident report under Condition D6;</p> <p>(c) an approval of an Annual Review under Condition D4; or</p> <p>(d) a completion of an audit under Condition D7</p> <p>the Applicant shall review, and if necessary, revise the strategies, plans, and programs required under this consent to the satisfaction of the Planning Secretary.</p> <p>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</p>	Interviews with site personnel	<p>Section 7.7 of the OEMP sets out the requirements for review of the OEMP and also references Section 4.4 (note should be 4.3, Review and Update of Environmental Risk Register). These two sections include triggers for OEMP reviews including changes to operational and/ or environmental controls, major changes in legislative requirements, audit report outcomes and incident, significant near miss and non-conformance investigation reports or if not triggered by the above, every five years. Whilst some of the triggers for OEMP review in Condition D5 are captured in the OEMP, the OEMP does not specifically address the requirement of Condition D5 that plans and programs are reviewed following the Annual Review.</p> <p>The OEMP was revised in 2020 and 2026. Ampol reported that following the significant incident in April 2022, a number of upgrades were agreed with the EPA that took time to implement. Following completion of the works in 2024, the OEMP was reviewed in 2025 and completed in 2026. It is acknowledged that the OEMP is a large and comprehensive document and that reviews of the OEMP and attached sub-plans take considerable time. However, it is considered that to comply with this requirement, Ampol are required to review the OEMP and sub plans if the triggers outlined in Condition D5 are met, which includes annually following approval of the Annual Review.</p>	<p>Non-compliant</p> <p>2026 IEA REC 01 Update Section 7.7 of the OEMP to specifically address the requirements of Development Consent Condition D5 for review of management plans and programs; and implement.</p>
D6	The Applicant shall notify the Secretary and any other relevant agencies of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment associated with the development as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of this incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident.	<p>Letter to DPHI dated 09/04/2022 re Incident Notification Flooding of Wastewater Treatment Plan at Ampol Kurnell</p> <p>DPHI acknowledgement of receipt of incident notification dated 11/04/2022</p> <p>Enforceable Undertaking 30/08/2023</p> <p>Show Cause Letter issued by EPA 06/05/2024 re pipeline rupture incident</p>	<p>There were five incidents which occurred during the audit period that were notified to the EPA as causing or threatening material harm to the environment. The Ampol PIRMP, and <i>Guideline - Pollution Incident Response Management Plans (EPA, 2022)</i> does not include a requirement to notify DPHI.</p> <p>Ampol assessed that of the 5 incidents that were notified to the EPA, only the following incident triggered notification to DPHI:</p> <ul style="list-style-type: none"> • WWTP overflow incident on 7 April 2022 following heavy rainfall. The incident resulted in hydrocarbon-impacted floodwaters overflowing from the WWTP and the site into the surrounding environment and residential areas of Kurnell. The incident was reported to DPHI by letter 	<p>Non-compliant</p> <p>2026 IEA REC 02 Notify DPHI as soon as practicable after an incident with the potential to cause significant off-site impacts on people or the biophysical environment, and follow</p>

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
		<p>Official Caution issued by EPA 16/07/2024 re pipeline rupture incident</p> <p>Email from EPA 11/07/2025 re shipping noise complaints</p> <p>Advisory Letter issued by EPA 17/07/2025 re shipping noise impacts</p> <p>Ampol response to Advisory Letter re shipping noise impacts 06/08/2025</p> <p>Email to EPA 27/09/2025 notifying of complaints relating to ship emitting black smoke and advising EPA Environment Line was called.</p> <p>Email from EPA 29/09/2025 requesting further details of incident in form of R3 incident report</p> <p>Email to EPA providing R3 Incident Report 1/10/2025</p> <p>Email from EPA 6/12/2024 requesting further information on reported oil sheen from ship berthed at Kurnell Wharf</p> <p>Letter to EPA 10/12/2024 providing information requested re POLAR BRIGHT sheen incident</p>	<p>dated 9 April 2022 via the Major Projects Portal. DPHI responded that the 'Department has no comments on the document at this time' which Ampol interpreted as not requiring to provide an incident report.</p> <p>Ampol assessed that the other four incidents that were notified to the EPA, did not trigger notification to DPHI, i.e:</p> <ul style="list-style-type: none"> • A pipeline rupture on 22 March 2024 caused the release of up to 5,500 L of gasoline. The gasoline did not escape from the premises and was captured on site and directed to the WWTP. This incident resulted in a Show Cause letter and Official Caution being issued by the EPA, however as the incident did not cause off-site impacts, it was not reported to DPHI. A number of odour complaints were received by Ampol and the EPA. Although gasoline did not escape from the premises, the loss of containment of gasoline on-site had potential to cause off-site impacts to the environment and people. • A significant number of noise complaints were received over the period 6-13 July 2025 relating to the two sister ships the HAFNIA LARVIK and HAFNIA LILLESAND berthed at the Kurnell Wharf. This issue was discussed with the EPA and an Advisory Letter issued by the EPA dated 17/07/2027. Follow up actions were managed through Special Conditions included on the EPL (refer EPL Condition E4). Ampol reported that in 2022 DPHI confirmed that exceedances of noise limits are not considered notifiable incidents under Condition D6. On this basis, Ampol did not notify DPHI of the complaints received relating to the noise from these ships. • A ship berthed at Kurnell Wharf emitted black smoke on 27 September 2025. This was reported to the EPA and an incident report provided. No further requests / actions were taken by the EPA. A number of complaints were received by Ampol and the EPA regarding the smoke. • A ship berthed at Kurnell Wharf (POLAR BRIGHT) released an oily sheen into the water on 5 December 2024. This was reported to the EPA and an incident report provided. No further requests / actions were taken by the EPA.. <p>As the April 2022 WWTP overflow event was not reported to DPHI as soon as practicable after becoming aware of the incident and an incident report was not provided to DPHI, this condition has been assessed as non-compliant.</p> <p>There is an opportunity for improvement for Ampol to consider reporting incidents that trigger reporting under the PIRMP to also be reported to DPHI.</p>	<p>up with an incident report.</p> <p>2026 IEA OFI 20 Consider reporting incidents that trigger reporting under the PIRMP, to also be reported to DPHI.</p>

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
D7	<p>Within a year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:</p> <ul style="list-style-type: none"> (a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL and/or Water License (including any assessment, plan or program required under these approvals); (d) review the adequacy of any approved strategy, plan or program required under these approvals; and (e) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals. <p><i>Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary.</i></p>	<p>2021 IEA Report, Lloyd's Register LRQA, August 2021 V3 Acknowledgment of receipt dated 29/04/2021 from Major Projects Portal submitting 2021 IEA Email from DPHI 20/08/2021 providing comments on 2021 IEA Email from DPHI 31/08/2021 responding to amended 2021 IEA Ampol letter requesting 2024 IEA deferral submitted via Major Projects Portal 29/05/2024 DPHI letter dated 27/06/2024 approving 2024 IEA deferral DPHI email dated 20/11/2025 notifying that technical breach of D8 due to timing of IEA</p>	<p>The third IEA was conducted in 2021 by an auditor from Lloyd's Register Quality Assurance Limited that was approved by DPHI.</p> <p>The 2021 IEA covered the audit period 2017 – 2021. DPHI approval was obtained to defer the audit from September 2020 to May 2021 due to operational restrictions arising from the COVID-19 pandemic. The 2021 IEA was submitted to DPHI via the Major Projects portal on 29/04/2021. Comments were received from DPHI and the IEA amended and resubmitted on 30/08/2021. Email correspondence was received from DPHI noting that the Department had finalised its review of the 2021 IEA and closed the matter out.</p> <p>The fourth IEA was due for completion in August 2024. Ampol requested that DPHI extend the IEA period from every three years to every four years. DPHI approved a one-off extension of the 2024 IEA to be completed by 30/08/2025. The original auditor that was approved by DPHI was unable to undertake the audit. DPHI was informed of this and an alternate auditor proposed who was not approved by DPHI. The current 2025 IEA audit team was approved by DPHI on 11/09/2025. DPHI was informed via email that the lead auditor would not be able to complete the audit in October as originally planned due to personal health issues. The audit was re-scheduled for the first quarter of 2026 with the audit site inspection taking place on 16/02/2026. DPHI notified Ampol by email dated 20/11/2025 that it considered this a breach of Condition D7.</p> <p>The auditor considers that Ampol commenced the process of planning and commissioning the 2024 IEA with sufficient time to meet the extended deadline and that the reasons for the delay were outside of Ampol's control. This condition has been assessed as non-compliant as the timing for the fourth IEA was not met however, no recommendations are made.</p> <p>The 2025 IEA addresses the requirements of this condition. Refer to this IEA report Section 1.2 Audit Scope for details of where each item is addressed.</p>	Non-compliant

Table 10 EPL 837 conditions assessed as non-compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997	Refer Development Consent Condition C10	Ampol reported it was non-compliant against this condition in its 2021-2022 Annual Return and its 2022 Annual Review based on an oily-water overflow incident that occurred on 7/04/2022 that impacted waterways, wetlands and surrounding land in Kurnell. Refer to Development Consent Condition C10 for further details; and this IEA report Section 3.1.2 for further discussion of incidents.	Non-compliant
L5.1	Noise from the premises must not exceed: a) An LAeq(15 minute) noise emission criterion of 60dB(A) (7:00am to 6:00pm) seven days a week; and b) An LAeq(15 minute) noise emission criterion of 50dB(A) at all other times, and c) An LAmix noise emission criterion of 55dB(A) (10:00pm to 7:00am) except as expressly provided by this licence.	Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025	Ampol reported exceedances of the night-time noise limits due to shipping noise in its Annual Returns. Refer to C17 for further discussion.	Non-compliant
L5.2	Noise from the premises is to be measured or computed at any point within one metre of any affected residence to determine compliance with condition L5.1. 5dB(A) must be added if the noise is tonal or impulsive in character	Site inspection observations Interviews with site personnel Review of Shipping Noise Protocols, RWDI, 13/02/2026	Noise from the premises is measured at the Wharf using the SoundScience SmartData noise monitoring system which was developed by noise consultants Wilkinson Murray. This system continuously records noise levels, audio and meteorological data and predicts real-time noise levels at the six identified residential receivers. The Review of Shipping Noise Protocols required by EPL Condition E4 and undertaken by acoustic consultants RWDI, reported that the system does not apply a modifying factor correction for tonal noise, only low-frequency noise as informed by the 2018 study. Ampol reported that when the system was first developed in 2018, tonality was not a feature of the numerous night-time noise level measurements taken during ship berthing. Tonal noise was first observed in one of the sister ships in 2024 and then again when both sister ships were birthed at the Wharf in July 2025. In response, Ampol engaged RWDI to investigate the source of the tonal noise which was determined to be the IG system. As a correction factor for tonal noise was not included in the SoundScience Smart Data noise monitoring system, this condition was assessed as non-compliant. However, it is noted that tonal noise is a newly identified issue and that Ampol is in discussions with the EPA on the best way to manage tonal noise.	Non-compliant 2026 IEA REC 03 Review if a modifying factor is required for the tonal noise recently experienced from some ships, in consultation with acoustic consultants and the EPA.
L5.4	For the purposes of determining the noise generated at the premises the modification factors in Section 4 of the NSW Industrial Noise Policy must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.	Review of Shipping Noise Protocols, RWDI, 13/02/2026	Section 4 of the NSW Industrial Noise Policy includes that modifying factors should be applied for tonal noise characteristics. As reported in EPL L5.2, modification factors for tonal noise are not applied by the SoundScience Smart Data noise monitoring system.	Non-compliant
L6.1	The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.	Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025	Based on the number of complaints received, Ampol reported it was non-compliant with this condition in its Annual Returns to the EPA in 2021-2022, 2022-2023, 2023-2024 and 2024-2025. Refer Development Consent Condition C26.	Non-compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
R2	<p>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</p>	<p>Enforceable Undertaking 30/08/2023</p>	<p>The Guideline - Pollution Incident Response Management Plans (EPA, 2022) identifies the dictionary meaning of immediately is promptly and without delay.</p> <p>As the Enforceable Undertaking for the oily-water overflow incident on 7/04/2022 stated that “Ampol did not immediately notify the EPA, Fire and Rescue NSW, SafeWork NSW, Sutherland Shire Council or NSW Health of the Incident”, this condition was assessed as Non-compliant.</p> <p>The auditor did not assess whether relevant authorities were notified immediately of incidents causing or threatening material harm to the environment.</p>	<p>Non-compliant</p> <p>2026 IEA REC 04 Review incident notification requirements triggered by Condition D6 and EPL R2 and revise incident management processes, implement and train employees, as required.</p>

4 SUMMARY OF RECOMMENDATIONS

Recommendations for non-compliant SSD-5544 and EPL 837 conditions (where required) are included in Table 11.

Opportunities for improvement for SSD-5544 and EPL 837 conditions assessed as compliant are included in Table 12.

Table 11 Summary of IEA recommendations

Source	Recommendation
Development Consent Condition D5 and OEMP review	2026 IEA REC 01: Update Section 7.7 of the OEMP to specifically address the requirements of Development Consent Condition D5 for review of management plans and programs and implement
Development Consent Condition D6	2026 IEA REC 02: Notify DPHI as soon as practicable after an incident with the potential to cause significant off-site impacts on people or the biophysical environment, and follow up with an incident report
EPL Condition L5.2	2026 IEA REC 03: Review if a modifying factor is required for the tonal noise recently experienced from some ships, in consultation with acoustic consultants and the EPA.
EPL Condition R2	2026 IEA REC 04: Review incident notification requirements triggered by Condition D6 and EPL R2 and revise incident management processes, implement and train employees, as required.

Table 12 Summary of Opportunities for Improvement

Source	Opportunity for Improvement
Development Consent Condition D2 and OEMP review	2026 IEA OFI 01: Update the OEMP to include the role of the Community Engagement Manager. This includes Section 5.3 Environmental Roles and Responsibilities and Section 5.6 Community Concerns and Complaints.
Development Consent Condition D2 and OEMP review	2026 IEA OFI 02: Update site figure in Appendix A of the OEMP 'Caltex Terminal Operational Boundary' to reflect that the Western ROW is no longer owned by Ampol and within its operational control.
Development Consent Condition C22 and NMP review	2026 IEA OFI 03: Update NMP to include measures for the minimisation of tonal noise from ship systems and specifically the Inert Gas system.
Development Consent Condition C22 and NMP review	2026 IEA OFI 04: Update the NMP to clearly describe how to assess compliance with noise limits for non-shipping relating activities (for example during the day). The Annual Review states that "During the initial stage of undertaking any high noise generating activities, and during where needed e.g. grit blasting (paint removal) in proximity (100m) to a specified residential receiver (R1-R8), noise measurement and monitoring will be carried out." This information is missing from the NMP
Development Consent Condition C22 and NMP review	2026 IEA OFI 05: The NMP states that reporting to the EPA and DPHI will occur via email when ship noise output is assessed via SoundScience to exceed noise limits and when complaints are received relating to shipping activities. It is understood that DPHI confirmed that it no longer requires Ampol to notify it of ship night-time noise exceedances. Update the NMP to reflect current practices of notifying the EPA only.
Development Consent Condition C22 and NMP review	2026 IEA OFI 06: The NMP discusses incident management and states that noise complaints will be logged and tracked in the LPS, however it is not clear whether exceedances of noise limits are also logged in the LPS. Update the NMP to describe how noise exceedances will be recorded.

Source	Opportunity for Improvement
Development Consent Condition C35 and AQMP review	2026 IEA OFI 07: Identify measures to minimise energy use and greenhouse gas emissions at the Kurnell Terminal in alignment with the broader Ampol sustainability goals and document within the OEMP / AQMP. Include discussion of implementation of these measures within Annual Reviews submitted to DPHI.
Development Consent Condition C27 and AQMP review	2026 IEA OFI 08: Update the AQMP to include control measures relating to odour from the WWTP including the odour abatement systems implemented by Ampol in 2024 / 2025.
Development Consent Condition C40 and WMP review	2026 IEA OFI 09: Update the WMP to include the following waste streams, their classification and management strategies: activated carbon filters from WWTP, waste sand, salt and clay from the Jet Fuel Treating Unit, fire-fighting foam (PFAS and non-PFAS).
Development Consent Condition C42 and BWPMP review	2026 IEA OFI 10: Include within the BWPMP the program for undertaking weed management across the site. Pesticide application and pesticide use training and record keeping is discussed but not the timing, frequency, location and type of weed management activities. The weed program can be a separate document that is referred to in the BWPMP.
Development Consent Condition C42 and BWPMP review	2026 IEA OFI 11: Update the BWPMP to include the measures implemented by Ampol for managing feral animals and pests.
Development Consent Condition C42 and BWPMP review	2026 IEA OFI 12: Include within the BWPMP the requirement for trimming vegetation along the Yena Gap pipeline in Kamay Botany Bay National Park and the approvals and requirements for undertaking this clearing work.
Development Consent Condition B2	2026 IEA OFI 13: Update the approved plans within SSD 5544 to remove the Western ROW as this land is no longer owned by Ampol and under its operational control.
Development Consent Condition B16 and EPL Condition O2.1	2026 IEA OFI 14: Implement weed management inside Tank 512 and Tanks 102 -105 bunds.
Development Consent Condition B16 and EPL Condition O2.1	2026 IEA OFI 15: Prior to filling the 1& Solberg tank on the Wharf, assess adequacy of spill containment at tank fill point
Development Consent Condition B21	2026 IEA OFI 16: Include a brief overview of the legislative requirements including the Development Consent and EPL in the Kurnell Terminal Site Specific Induction
Development Consent Condition C40	2026 IEA OFI 17: For waste that has been classified by environmental consultants (e.g. excavated material from remediation projects) attach the waste classification reports to the corresponding entry in the Waste Log
Development Consent Condition C40	2026 IEA OFI 18: Investigate opportunities for recycling of cardboard, paper and comingled waste
Development Consent Condition D4	2026 IEA OFI 19: For future Annual Reviews, update Table 2A, Section 2.3 Environmental Monitoring Performance to include the EPL limits for all pollutants.
Development Consent Condition D6	2026 IEA OFI 20: Consider reporting incidents that trigger reporting under the PIRMP, to also be reported to DPHI.
EPL Condition O6.4	2026 IEA OFI 21: Consult with the EPA regarding EPL conditions O6.3 and O6.4 given the length of time the wastewater treatment plant has been bypassing the biotreater and that bypassing the biotreater was intended to be a back-up system.

5 STATEMENT OF LIMITATIONS

Ethos Environmental Pty Limited (Ethos Environmental) has prepared this report in accordance with the usual care and thoroughness of the consulting profession for the use of Client and only those third parties who have been authorised in writing by Ethos Environmental to rely on this report.

It is based on generally accepted practices and standards at the time it was prepared. No other warranty, expressed or implied, is made as to the professional advice included in this report. It is prepared in accordance with the scope of work and for the purpose outlined in the proposal dated contract dated 3 September 2025.

The methodology adopted and sources of information used by Ethos Environmental are outlined in this report. Where this IEA report indicates that information has been provided to Ethos Environmental by third parties, Ethos Environmental has made no independent verification of this information except as expressly stated in the report. Ethos Environmental assumes no responsibility for any inaccuracies or omissions to that information.

This report was prepared between 5 January and 29 March 2026 and is based on the information reviewed and conditions encountered at the time of the site visits on the 16 and 24 February 2026. Ethos Environmental disclaims responsibility for any changes that may have occurred after the site visit.

This report should be read in full. No responsibility is accepted for use of any part of this report in any other context or for any other purpose or by third parties. This report does not purport to give legal advice. Legal advice can only be given by qualified legal practitioners.

Except as required by law, no third party may use or rely on this report unless otherwise agreed by Ethos Environmental in writing. Where such agreement is provided, Ethos Environmental will provide a letter of reliance to the agreed third party in the form required by Ethos Environmental.

To the extent permitted by law, Ethos Environmental expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any third party relating to or resulting from the use of, or reliance on, any information contained in this report. Ethos Environmental does not admit that any action, liability or claim may exist or be available to any third party.

Appendix A: Compliance Tables - Development Consent SSD-5544 and Environment Protection Licence 837

Table A1: Development Consent SSD-5544 Compliance Assessment

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT				
B1	The Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction or operation of the development.	Interviews with site personnel Site inspection observations Documents and records reviewed as listed under specific conditions	Ampol has developed an OEMP including associated sub plans for the Kurnell Terminal as per the requirements of the Development Consent defining mitigation measures to prevent or minimise harm to the environment during operation of the Terminal. These plans were approved by DPHI. In addition, Ampol has developed an Operational Excellence Management System (OEMS) that provides the framework for managing health and safety, the environment, quality and risk. The OEMS is certified as meeting the requirements of ISO14001:2015. The OEMS includes the guidelines, operating standards, procedures, work instructions, and forms for environmental management across the Ampol Group. Ampol uses its Loss Prevention System (LPS) to report, investigate and track incidents and near misses including environmental incidents. During the audit period, five incidents were reported to the EPA as having the potential to cause harm to the environment. These are discussed further in this IEA report Section 3.1. Based on the information provided by Ampol and observations made during the site inspection, and subject to issues and recommendations made in this report, Ampol has generally implemented measures to prevent and/or minimise any harm to the environment.	Compliant
TERMS OF CONSENT				
B2	The Applicant shall carry out the Development generally in accordance with the: (a) EIS; (b) RTS; (c) site layout plans and drawings in the EIS (see Appendix A); (d) MOD 1; (e) MOD 2; (f) MOD 3; (g) MOD 4; (h) MOD 5; and (i) MOD 6.	Site inspection observations Documents and records reviewed as listed under specific conditions EPL Notice of Variation 31/07/2025	The requirements of the Environmental Impact Statement (EIS), Response to Submissions (RTS) and Modifications have been incorporated into the Conditions of Consent. This audit has focused on reviewing compliance with the Conditions of Consent. A detailed assessment of compliance with the EIS and RTS was not undertaken. MOD 1 approved the demolition and removal of redundant process refinery units, tanks, pipeways/pipelines and infrastructure. MOD 2 approved ACS management works including the construction of the ACS Containment Cell. These works have been completed as assessed in previous IEAs. MOD 3 approved Tank 101 demolition works. MOD 4 extended the demolition works period. These works have been completed as assessed in previous IEAs MOD 5 approved amendments to ACS management works and cooling water outlet pipeline. These works have been completed as assessed in previous IEAs.	Compliant 2026 IEA OFI 13: Update the approved plans within SSD 5544 to remove the Western ROW as this land is no longer owned by Ampol and under its operational control.

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
			MOD 6 extended the ACS management works period. Works were completed within the timeframe as assessed in previous IEAs. Site operations are generally as per the site layout plans included in Appendix A as modified. However, it is understood that Ampol has sold the lands of the Western ROW which had previously held the cooling water discharge pipeline for the refinery. Ampol applied for a licence variation to remove the Western ROW from EPL 837 and this was granted by the EPA on 31 July 2025. The approved plans within the Development Consent still include the Western ROW. Ampol has lodged a modification application (MOD 7) to consolidate operational infrastructure, remove redundant assets and undertake remediation and grading. As part of that application, updated site plans have been submitted which do not include the Western ROW. Approval of MOD 7 will likely update the approved plans, however should MOD 7 not go ahead, it is recommended that the approved plans be updated to remove the Western ROW from the plans.	
B3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this Consent shall prevail to the extent of any inconsistency.		Noted.	Noted
B4	The Applicant shall comply with any reasonable requirement(s) of the Secretary arising from the Department's assessment of: (a) any reports, plans or correspondence that are submitted in accordance with this consent; and (b) the implementation of any actions or measures contained within these reports, plans or correspondence.	Refer Conditions C8 & D4	During the audit period, Ampol complied with DPHI requirements arising from reviews of the following: <ul style="list-style-type: none"> 2021 Annual Review (refer Condition D4) 2021 IEA (refer Condition D7) 2024 Hazard Audit (refer Condition C8) 	Compliant
B5	Subject to confidentiality, the Applicant shall make all documents required under this consent available for public inspection on request.	https://www.ampol.com.au/sustainability/environment/kurnell-refinery-conversion-project (accessed 12/02/2026)	A large number of documents required under this consent have been made available on the Ampol website (Refinery Conversion Project webpage. Refer Condition D9.	Compliant
LIMITS OF CONSENT				
B6	The Applicant shall not store in excess of 925 mega litres (ML) of refined product on the Site at any one time, unless otherwise agreed to in writing by the Secretary.	Kurnell Terminal Hazard Audit 2024, Arriscar, Rev1, 23/04/2025	According to the Inventory of Storage Tanks at Kurnell included in the 2024 Hazard Audit, the maximum product storage capacity at Kurnell is 894,747,143 L. This is below the 925 ML limit. The OEMP reports a total of 742,664kL of refined product (not including slops, water and firewater)	Compliant
B7	The construction works associated with the Development shall not extend beyond five (5) years from the date of approval.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Construction works associated with the Development were completed outside the audit period and assessed as compliant in 2021 IEA.	Complete
B7A	The demolition works associated with the development must not extend beyond 10 June 2019.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Demolition works associated with the Development were completed outside the audit period and assessed as compliant in 2021 IEA.	Complete

Ampol Kurnell Terminal 2025 IEA Development Consent SSD 5544

SSD 5544 – Conversion and Operations
MOD 1 2015 – Demolition of Redundant Refinery Infrastructure
MOD 2 2017 – ACS Management Works
MOD 3 2017 – Tank 101 Demolition Works
MOD 4 2018 – Extension of Demolition Works Period
MOD 5 2019 – ASC Containment Cell and CWO Pipeline
MOD 6 2020 – Extension of ACS Management Works Period

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
B7B	B7B. Notwithstanding Condition B7A, the ACS Management Works must not extend beyond 31 March 2020.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	ACS Management Works were completed outside the audit period and assessed as compliant in 2021 IEA.	Complete
LAPSING OF CONSENT				
B8	This consent shall lapse on 1 December 2018 unless any part of the Project is physically commenced (within the meaning of section 95 of the EP&A Act) on or before that day, in accordance with any consent or development consent, on the Land to which the consent or consent relates.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete in previous IEAs.	Complete
SURRENDER OF EXISTING DEVELOPMENT CONSENTS				
B9	Within six (6) months of ceasing refining operations, or as otherwise agreed in writing by the Director-General, the Applicant shall surrender all existing development consents for the site listed in Appendix B in accordance with Clause 97 of the EP&A Regulation.	2017 IEA Report, Lloyd's Register LRQA, May 2018	Assessed as complete in previous IEAs.	Complete
B10	Within six (6) months of the issue of a Compliance Certificate or Occupation Certificate for the following development consents, or as otherwise agreed in writing by the Secretary, the Applicant shall surrender these consents in accordance with Clause 97 of the EP&A Regulation. (a) DA 13/0195 – Stormwater Drainage Upgrade; and (b) DA 12/0238 – Construction of a switch room.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete in previous IEAs.	Complete
B11	Nothing in this consent alters or modifies the following development consents: (a) SSD 5353 – Port and Berthing Works; (b) DA 13/0335 – Construction and operation of a Bio-Pile Pilot Trial to treat Hydrocarbon impacted soils; (c) DA 09/840 – Jet Fuel Remediation; and (d) DA 11/1090 – Remediation of Limestone Pits.		Noted	Not triggered
STATUTORY REQUIREMENTS				
B12	The Applicant shall ensure that all licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the Development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approval/consents.	EPL 837 MHF licence 20-6-96 (granted 14/10/2025) NPWS Consent 18/04/2023 NPWS Decision Statement 06/04/2023	Ampol holds EPL 837 for the Scheduled Activity of chemical storage and shipping in bulk. The EPL was last varied on 31/07/2025. Ampol Australia Petroleum Kurnell was granted a licence to operate a Major Hazard Facility (MHF) at 2 Solander Street, Kurnell by SafeWork NSW. The latest MHF licence (No. 20-6-96) was granted on 14/10/2025 and expires on 14/10/2030. Ampol also has consent dated 18/04/2023 by National Parks and Wildlife Service (NPWS) to undertake vegetation clearing along 400m of above ground section of Yena Gap wastewater Pipeline in the Kamay Botany National Park. The consent is valid for 5 years (18/04/2028).	Compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
AMENDED ENVIRONMENT PROTECTION LICENCE (EPL) REQUIREMENT				
B13	Prior to the commencement of construction, the Applicant must apply to the EPA to vary the Environment Protection Licence (EPL) for the Kurnell Refinery (Licence No. 837) to permit the Development.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete in previous IEAs.	Complete
B13A	The Applicant shall apply to the EPA to vary the EPL if additional scheduled activities are required to be undertaken as result of the demolition works.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Demolition works completed outside the audit period. Assessed as compliant in 2021 IEA.	Complete
STRUCTURAL ADEQUACY				
B14	The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the BCA. Notes: Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.	Interviews with site personnel	No new buildings or structures or alterations to buildings and structures constructed during audit period.	Not triggered
B15	The Applicant shall ensure that all demolition work is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Demolition works completed outside the audit period and assessed as complete in previous IEAs.	Complete
OPERATION OF PLANT AND EQUIPMENT				
B16	The Applicant shall ensure that all plant and equipment used for the Development is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Site inspection observations Interviews with site personnel Oily Wastewater Maintenance 12 Monthly Procedure (CD6662), V2, 15/08/2024 Oily Water Drain and Pit Cleaning, Work Instruction (CD 19504), V1, 1/07/2024 M7 Notification Management Process SAP PM M7 Operational Notification Management National Procedure, V2, 5/06/2023 Demonstration of SAP PM M7 system M7 70162042 for pH probe calibration 27/01/2026 M7 70159239 for ACS containment cell mechanical equipment inspection 12/11/2025	Ampol uses the SAP PM system for creating and tracking maintenance tasks. M7's are generated for planned preventative maintenance tasks and M8's for reactive maintenance tasks. The SAM PM system was demonstrated to the auditors during the site inspection. In addition, tank integrity testing is undertaken as per Ampol's Risk Based Inspection (RBI) system by the engineering team. These inspections are not included in the SAP PM system however any actions arising from them would be raised as a PM8. Examples of maintenance of plant and equipment sighted / discussed include: <ul style="list-style-type: none"> pH probe was calibrated on 27/01/2025 (sighted M7 record). Ampol reported that the SoundScience SoundData noise meter was inspected quarterly by RWDI and the microphone calibrated. Every two years NATA calibration is undertaken of the sound level meter and the acoustic calibrator (sighted certificates of calibration for the sound level meter and the acoustic calibrator dated 24/11/2025). Oily water drains located within the Kurnell Terminal are cleaned and emptied annually (sighted procedure). 	Compliant 2026 IEA OFI 14 Implement weed management inside Tank 512 and Tanks 102 -105 bunds 2026 IEA OFI 15 Prior to filling the 1& Solberg tank on the Wharf, assess adequacy of spill containment at tank fill point

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
		<p>Calibration Certificate for Acoustic Calibrator, 24/11/2025</p> <p>Calibration Certificate for Sound Level Meter</p> <p>Soil Buildup on Piping Inspection 6 Monthly (CD20084) V1, 7/02/2025</p> <p>Sand Buildup Inspections 2025_2026 (Excel workbook)</p> <p>Demonstration of LMS</p>	<ul style="list-style-type: none"> ACS containment cell leachate mechanical equipment (pumps and sumps) inspected six monthly. (sighted M7 record of last completed inspection on 12/11/2025). Six monthly inspections of pipelines to identify soil build up / sand migration on to the pipelines (example sighted for inspection completed 21/03/2025). Piping visual inspection to identify external corrosion, coating damage, leakage, corrosion at supports, inadequate supports and other defects (sighted procedure). Operator competency and training is managed through Ampol's Learning Management System (LMS). Completed inspections for bund outlet pipe position (open/close) were available on site Some vegetation was observed to be present in the bunds of Tank 512 and Tanks 105, 104, 103 and 102 (refer photos #08-#11). The OEMP states "<i>Caltex conduct regular inspection programs on Site to monitor bund walls and identify if repairs are required. The routine T&I program includes inspections of and repairs to tank bund walls, at an approximate frequency of every 8-10 years in accordance with Caltex Tank Standards</i>". Ampol was in the process of converting its fire-fighting PFAS foam to fluorine free foam (Solberg 1% foam concentrate). At the time of the audit site inspection, Ampol was preparing for the new foam commissioning process at the wharf. The new permanent Solberg 1% tank had been installed at the Wharf but was yet to be filled. The Solberg 1% tank fill point connection was observed to be unbunded on the wharf. Ampol advised that due to space restraints it was not feasible to bund the fill point and as the activity of filling the tank with foam is not expected to be conducted regularly, the risk of drips and spills during filling would be managed using temporary spill trays. <p>Given the extent and nature of this condition, not all aspects of the maintenance and operation of plant and equipment used on site was able to be assessed. Based on the systems reviewed and documents provided, the Kurnell Terminal was considered to be generally compliant with this condition.</p>	
PROTECTION OF PUBLIC INFRASTRUCTURE				
B17	Prior to the commencement of <u>construction</u> , the Applicant shall: (a) prepare a dilapidation report of the public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete in previous IEAs.	Complete

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	(b) submit a copy of this report to the Secretary and Council.			
B17A	Prior to the commencement of <u>demolition works</u> , the Applicant shall: (a) prepare a dilapidation report of the public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and (b) submit a copy of this report to the Secretary and Council.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete in previous IEAs.	Complete
B18	The Applicant shall: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.	2021-2025 Annual Reviews	Ampol reported that this has not been triggered during the audit period.	Not triggered
STAGED SUBMISSION OF PLANS OR PROGRAMS				
B19	With the approval of the Secretary, the Applicant may: (a) submit any strategy, plan or program required by this consent on a progressive basis; and/or (b) combine any strategy, plan or program required by this consent. Notes: If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program shall clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages and the trigger for updating the strategy, plan or program. There must be a clear relationship between the strategy, plan or program that are to be combined."	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Not triggered during the audit period. Previous versions of plans and strategies were staged as assessed in previous IEAs.	Not triggered
DISPUTE RESOLUTION				
B20	In the event that a dispute arises between the Applicant and Council or a public authority other than the Department, in relation to a specification or requirement applicable under this consent, the matter must be referred by either party to the Secretary, or if not resolved, to the Minister, whose determination of the dispute shall be final and binding to all parties. For the purpose of this condition, 'public authority' has the same meaning as provided under Section 4 of the Act.	2021-2025 Annual Reviews	Ampol reported that this has not been triggered during the audit period. No disputes were identified during consultation by the auditor with Council, the EPA and FRNSW as part of this IEA.	Not triggered
B21	The Applicant shall ensure that employees, contractors and sub-contractors are aware of, and comply with, the conditions of this consent relevant to their respective activities.	Ampol National Induction Kurnell Terminal Site Specific Induction (presentation and assessment)	Ampol has an organisation LMS which assigns individual training needs and tracks currency and completion of training requirements. The LMS was demonstrated to the auditors during the audit site inspection.	Compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
		<p>Environmental Awareness module (Part 1 & 2)</p> <p>Environmental Stewardship training presentation Kurnell Terminal Wharf Projects, Freyssinet Team, 23/03/2021</p> <p>Demonstration of LMS (sighted evidence of completion of Environmental Awareness Part 1 & 2 by Operations Specialist and Operations Coordinator)</p>	<p>Ampol employees are required to complete the National Induction. The National Induction whilst focused on safety also includes environmental considerations and incident reporting.</p> <p>Ampol operations personnel are required to complete on-line environmental awareness training. This provides an overview of the legislative framework, environmental focus areas for site operations including environmental control measures and incident management and reporting.</p> <p>Ampol employees and contractors are also required to complete the Kurnell Terminal Site Specific Induction before coming onto site and on an annual basis. The Kurnell Terminal Site Specific Induction covers emergency and spill response and reporting. It does not specifically mention the Development Consent or EPL.</p> <p>Additional environmental awareness training is conducted for contractors undertaking project works. For example, Environmental Stewardship training was conducted for contractors undertaking pipeline cathodic protection works at the Wharf. This training mentioned the EPA licence but not the Development Consent.</p> <p>Ampol reported that employees and contractors are made aware of Development Consent Conditions that are relevant to their scope of work. For example, contractors working on remediation projects (Manns Earthmoving, Ascon and AECOM) are familiar with the applicable Development Consent Conditions.</p> <p>Personnel interviewed during the site inspection (including the Terminal Operations Manager, Environmental Specialists, Remediation Specialist, Operations Specialists and Community Engagement Manager were aware of the Development Consent. On this basis, and as environmental awareness training was provided, this condition has been assessed as compliant, however an opportunity for improvement has been identified to include discussion of the Development Consent in the Kurnell Terminal Site Specific Induction.</p>	<p>2026 IEA OFI 16</p> <p>Include a brief overview of the legislative requirements including the Development Consent and EPL in the Kurnell Terminal Site Specific Induction</p>
B22	The Applicant shall be responsible for environmental impacts resulting from the actions of all persons that it invites onto the site, including contractors, sub-contractors and visitors.	<p>Interviews with site personnel</p> <p>Demonstration of LPS</p> <p>Ampol Safety Induction (includes environmental considerations and incident reporting)</p> <p>Kurnell Terminal Site Specific Induction (presentation and assessment)</p> <p>Environmental Awareness module (Part 1 & 2)</p> <p>OEMP</p>	<p>The OEMP (Environmental Roles and Responsibilities) describes roles and responsibilities for environmental impacts from the actions of its contractors, sub-contractors and visitors.</p> <p>Ampol reported that cold, hot, excavation and confined space entry work is conducted under a permit to work system, and spill response training is provided to operations personnel and bulk transport drivers.</p> <p>Ampol reported that it requires site personnel and contractors to complete an online induction and a site-specific induction. Visitors are accompanied on-site. The auditor was accompanied on site during the IEA.</p> <p>Contractors, sub-contractors and visitors are required to report incidents to Ampol, these are logged in Ampol's LPS.</p>	Compliant

Ampol Kurnell Terminal 2025 IEA Development Consent SSD 5544

- SSD 5544 – Conversion and Operations
- MOD 1 2015 – Demolition of Redundant Refinery Infrastructure
- MOD 2 2017 – ACS Management Works
- MOD 3 2017 – Tank 101 Demolition Works
- MOD 4 2018 – Extension of Demolition Works Period
- MOD 5 2019 – ASC Containment Cell and CWO Pipeline
- MOD 6 2020 – Extension of ACS Management Works Period

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations															
SCHEDULE C ENVIRONMENTAL PERFORMANCE AND MANAGEMENT																			
HAZARDS AND RISKS																			
Terms of Approval																			
C1	The Applicant shall: (a) carry out the Development in accordance with the PHA; (b) implement all control measures proposed in the PHA; (c) implement all actions proposed by Caltex in response to the recommendations from the Buncefield incident investigation report (Kurnell Buncefield Review - Final, submitted to the Department May 2013). (d) implement all proposed actions listed in Caltex's response to the Department's requests for additional information and clarifications (Caltex Response to D&I Queries of Caltex Submitted QRA – August 2013).	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete in previous IEAs.	Complete															
C1A	The Applicant shall implement the recommendations in section 6 of the document titled <i>Hazard and Risk Analysis of the proposed Caltex Kurnell Refinery Demolition Works (HRA)</i> , prepared by Planager Pty Ltd and enclosed in Appendix B of the SEE.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete in previous IEAs.	Complete															
Demolition																			
C1B	The Applicant shall ensure that relevant demolition work associated with the development is carried out in accordance with Australian Standard AS 2601:2001: <i>The Demolition of Structures</i> , or its latest version and the requirements of the <i>Work Health and safety Regulation 2011</i> .	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete in previous IEAs.	Complete															
C1C	The Applicant shall ensure that major demolition works as defined under the <i>Work Health and safety Regulation 2011</i> are undertaken by licensed demolition experts.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete in previous IEAs.	Complete															
Commissioning																			
C2	The Applicant shall commission the development in accordance with Table 1 below: <table border="1" data-bbox="332 1388 991 1675"> <thead> <tr> <th>System Description</th> <th>Estimated Commencement of Commissioning</th> <th>Estimated Commencement of Operation of System</th> </tr> </thead> <tbody> <tr> <td>Jet</td> <td>1 March 2014</td> <td>1 June 2014</td> </tr> <tr> <td>Diesel</td> <td>1 April 2014</td> <td>1 July 2014</td> </tr> <tr> <td>Gasoline</td> <td>1 May 2014</td> <td>1 August 2014</td> </tr> <tr> <td>Slop</td> <td>1 May 2014</td> <td>1 August 2014</td> </tr> </tbody> </table>	System Description	Estimated Commencement of Commissioning	Estimated Commencement of Operation of System	Jet	1 March 2014	1 June 2014	Diesel	1 April 2014	1 July 2014	Gasoline	1 May 2014	1 August 2014	Slop	1 May 2014	1 August 2014	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete in previous IEAs.	Complete
System Description	Estimated Commencement of Commissioning	Estimated Commencement of Operation of System																	
Jet	1 March 2014	1 June 2014																	
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Slop	1 May 2014	1 August 2014																	
Pre-construction																			

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
C3	<p>At least one month prior to the commencement of construction of the proposed Development (except for construction of those preliminary works that are outside the scope of the hazard studies), or within such further period as the Secretary may agree, the Applicant shall prepare, in consultation with WorkCover NSW, and submit for the approval of the Secretary, the studies set out under subsections (a) to (d) (the pre-construction studies) of this Condition. Construction, other than for preliminary works, shall not commence until approval has been given by the Secretary and, with respect to the Fire Safety Study, approval has also been given by Fire and Rescue NSW.</p> <p><u>(a) Construction Safety Study</u> A Construction Safety Study, consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 7, 'Construction Safety'. For developments in which the construction period exceeds six (6) months, the commissioning portion of the Construction Safety Study may be submitted two months prior to the commencement of commissioning.</p> <p><u>(b) Fire Safety Study</u> A Fire Safety Study for the proposed Development. This study shall cover the relevant aspects of the Department of Planning's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines' and the New South Wales Government's 'Best Practice Guidelines for Contaminated Water Retention and Treatment Systems'. The study shall also be submitted for approval to Fire and Rescue NSW.</p> <p><u>(c) Hazard and Operability Study</u> A Hazard and Operability Study for the proposed Development, chaired by an independent qualified person. The study shall be consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 8, 'HAZOP Guidelines'. The study report must be accompanied by a program for the implementation of all recommendations made in the report. If the Applicant intends to defer the implementation of a recommendation, reasons must be documented.</p> <p><u>(d) Final Hazard Analysis</u> A Final Hazard Analysis of the proposed Development, consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis'.</p>	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete in previous IEAs.	Complete

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	The FHA shall re-evaluate and confirm all relevant data and assumptions from the Preliminary Hazard Analysis.			
Pre-Demolition				
C3A	<p>At least one month prior to the commencement of demolition works (except for those preliminary works that are outside the scope of the hazard studies), or within such further period as the Secretary may agree, the Applicant shall prepare and submit for the approval of the Secretary the studies set out under subsections (a) to (b). Demolition, other than of preliminary works, shall not commence until approval has been given by the Secretary.</p> <p>(a) <u>FIRE WATER SYSTEM REVIEW</u></p> <p>A review of the Firewater System to detail which parts of the system will be removed and/or retained. This review shall include a list of measures that will be implemented to ensure that the firefighting capabilities of the Caltex Terminal will not be compromised during or as a result of the demolition works.</p> <p>(b) <u>DEMOLITION SAFETY STUDY</u></p> <p>The study shall report on the status of implementation of the recommendation outlined in the HRA for the demolition works, enclosed as Appendix B of the SEE. The study shall include examples of the hazards control plans developed for high risk activities and task based risk assessments of the process safety related hazards.</p>	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete in previous IEAs.	Complete
C3B	<p>C3B. Prior to commencement of the Tank 101 demolition works described in MOD 3, the Applicant must update the Demolition Safety Study prepared by Caltex (approved 11 December 2016), required under Condition C3A(b) to include a demolition management plan for the Tank 101 demolition works. The demolition management plan for the Tank 101 demolition works must be prepared in consultation with the Department</p>	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Demolition completed outside of audit period. Assessed as compliant in 2021 IEA.	Complete
Pre-commissioning				
C4	The Applicant shall develop, in consultation with WorkCover NSW, and implement the plans and systems set out under subsections (a) to (b) of this Condition. No later than two months prior to the commencement of commissioning of the proposed Development, or within such further period as the Secretary may agree, the Applicant shall submit, for the approval of the Secretary, documentation describing those plans and systems. Commissioning shall not commence until approval has been given by the Secretary.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete in previous IEAs.	Complete

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	<p>(a) <u>Emergency Plan</u> A comprehensive Emergency Plan and detailed emergency procedures for the proposed Development. This plan shall include consideration of the safety of all people outside of the Development who may be at risk from the Development. The plan shall be consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'.</p> <p>(b) <u>Safety Management System</u> A document setting out a comprehensive Safety Management System, covering all on-site operations and associated transport activities involving hazardous materials. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to the procedures. Records shall be kept on-site and shall be available for inspection by the Secretary upon request. The Safety Management System shall be consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management'.</p> <p>An inspection, testing and preventive maintenance program should be developed, implemented and maintained to ensure the reliability and availability of the key safety critical equipment is, at a minimum, consistent with the data estimated in the PHA.</p>			
C4A	No later than one month prior to the commencement of the demolition works, or within such a further period as the Secretary may agree, the Applicant shall submit for the approval of the Secretary an updated Emergency Plan and detailed emergency procedures. The plan shall be in accordance with the Department of Planning's Hazardous Industry Planning Advisory Paper No.1 'Industry Emergency Planning Guidelines' and shall provide information of the emergency arrangements during the demolition works.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete in previous IEAs.	Complete
C4B	Prior to commencement of the Tank 101 demolition works described in MOD 3, the Applicant must update and implement the Emergency Plan required under Condition C4(a) to incorporate the Tank 101 demolition works. The plan must include information of the emergency arrangements during the tank demolition works and a copy of the plan must be submitted to the Planning Secretary	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Tank 101 demolition works were completed outside the audit period. This requirement was assessed as non-compliant in the 2021 IEA as a record showing the updated Emergency Plan was submitted to DPHI was not available. This requirement is considered completed.	Complete

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
C5	Prior to the Commencement of commissioning the first asset within each system (see Condition C2), the Applicant shall submit a Pre-Commissioning Plan and Pre-Start-up Safety Review Checklists to the Secretary.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete in previous IEAs.	Complete
Pre-Start-up				
C6	<p>Pre-Start-up Compliance Report</p> <p>One month prior to the commencement of operation of the first asset in each of the four systems (see Condition C2), the Applicant shall submit to the Secretary, a report detailing compliance with Conditions C3, C4 and C5 of this consent. The report shall be prepared in consultation with WorkCover NSW, and shall include:</p> <p>(a) dates of study/plan/system submission, approval, commencement of construction and commissioning;</p> <p>(b) actions taken or proposed, to implement the recommendations and safety-related control measures in the studies/plans/systems; and</p> <p>(c) responses to each requirement imposed by the Secretary under Condition C7 of this consent.</p> <p>Note: Compliance with Condition C4 may not be achievable until after such time as the documentation describing the plans and systems required under that condition have been developed. A subsequent report may therefore be required to be prepared and submitted after the documentation required by Condition C4 has been developed.</p>	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete in previous IEAs.	Complete
Post-Start-up				
C7	<p><u>Post-Start-up Compliance Report</u></p> <p>Three months after the refinery process units shut down, the Applicant shall submit to the Secretary, a report that has been prepared in consultation with WorkCover NSW verifying that:</p> <p>(a) the Emergency Plan required under Condition C4(a) is effectively in place and that at least one emergency exercise has been conducted; and</p> <p>(b) the Safety Management System required under Condition C4 (b) has been fully implemented and that records required by the system are being kept.</p> <p>The report shall be prepared in consultation with WorkCover NSW.</p>	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete in previous IEAs.	Complete
C7A	<u>Fire Safety Study Review</u>	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Completed outside of audit period. Assessed as compliant in 2021 IEA.	Complete

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	One month prior to the completion of demolition works, or within such further period as the Secretary may agree, the Applicant shall submit for the approval of the Secretary, a revised Fire Safety Study for the Caltex Terminal. This study shall cover the relevant aspects of the Department's <i>Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines' and the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems.</i> The study shall also be submitted to NSW Fire and Rescue for approval.			
C8	<p>Hazard Audit</p> <p>Twelve months after all four systems being fully operational and every three years thereafter, or at such intervals as the Secretary may agree, the Applicant shall carry out a comprehensive Hazard Audit of the proposed Development and within one month of each audit submit a report to the Secretary.</p> <p>The audits shall be carried out at the Applicant's expense by a qualified person or team, independent of the Development, approved by the Secretary prior to commencement of each audit. Hazard Audits shall be consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 5, 'Hazard Audit Guidelines' (HIPAP No. 5).</p> <p>The audit reports shall, in addition to the requirements provided in HIPAP No 5:</p> <p>(a) verify implementation of all actions proposed by Caltex in response to the recommendations from the Buncefield incident investigation report (Kurnell Buncefield Review - Final, submitted to the Department May 2013).</p> <p>(b) verify implementation of all actions listed in Caltex's response to the Department's requests for additional information and clarifications (Caltex Response to DP&I Queries of Caltex Submitted QRA – August 2013)</p> <p>(c) confirm that the throughput and storage quantities of potentially hazardous materials are consistent with the PHA.</p> <p>(d) verify that an inspection, testing and preventative maintenance program has been developed, implemented and maintained to ensure the reliability and availability of the key safety critical equipment.</p> <p>(e) verify implementation of any measures arising from the reports submitted in respect of Conditions C2 to C5 of this consent.</p>	<p>Kurnell Terminal Hazard Audit 2021, Arriscar, Rev 0, 10/11/2021 (third hazard audit)</p> <p>DPHI letter dated 28/01/2022 approving 2021 Hazard Audit</p> <p>DPHI letter dated 17/09/2024 approving 2024 hazard auditor</p> <p>Kurnell Terminal Hazard Audit 2024, Arriscar, Rev 1, 23/04/2025 (fourth hazard audit)</p> <p>Record of submission of 2025 Hazard Audit via Major Projects portal, 7/01/2025</p> <p>DPHI letter dated 21/01/2025 requesting further information</p> <p>DPHI letter dated 7/05/2025 approving 2024 Hazard Audit</p> <p>MEET-015126_2024 C8 Hazard Audit_Action Status Report_23 Jan 25</p>	<p>The third hazard audit was undertaken by Arriscar in 2021. DPHI approved the Hazard Audit (Rev 0, 10/11/2021), subject to implementation of the recommendations listed in the action plan, by letter dated 28/01/2022.</p> <p>The fourth hazard audit was undertaken by Arriscar in 2024. DPHI approved the lead auditor from Arriscar Pty Ltd to conduct the 2024 Hazard Audit by letter dated 17/09/2024.</p> <p>The hazard audit was conducted in October and November 2024 and included six recommendations and one opportunity for improvement. The 2024 Hazard Audit reviewed close out of the recommendations of the 2021 Hazard Audit and assessed all actions as closed.</p> <p>DPHI requested additional information in relation to the 2024 Hazard Audit by letter dated 21/01/2025. Specifically, that the pipeline rupture incident of Kurnell Pipeline A, be included in the hazard audit scope. The 2024 Hazard Audit was revised to address this requirement (Rev 1, 23/04/2025).</p> <p>DPHI approved the 2024 Hazard Audit (Rev 1, 23/04/2025), subject to implementation of the recommendations listed in the action plan, by letter dated 7/05/2025.</p> <p>Ampol logged the 2024 Hazard Audit recommendations as meeting actions in its Cintellate system to track implementation. A 'Status Report' dated 23/01/2025 indicated the majority of actions had been completed. One recommendation that relates to updating a 'Group' level document remains 'Active' and has been set a completion date of 30/06/2026.</p> <p>It is noted the auditors are not qualified hazard auditors and that implementation of 2024 Hazard Audit recommendations will be reviewed by the hazard auditor in the next hazard audit.</p>	Compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	The audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Applicant intends to defer the implementation of a recommendation, reasons must be documented.			
C9	<u>Further Requirements</u> The Applicant shall comply with all reasonable requirements of the Secretary in respect of the implementation of any measures arising from the reports submitted in respect of Conditions C2 to C8 of this consent inclusive, within such time as the Secretary may agree.	DPHI letter dated 21/01/2025 requesting further information DPHI letter dated 7/05/2025 approving Hazard Audit	Ampol complied with DPHI's request for further information following submission of Rev 0 of the 2024 Hazard Audit. Rev 1 of the Hazard Audit was approved by DPHI on 7/05/2025.	Compliant
Fire Risk Management During Demolition				
C9A	The Applicant shall: a) ensure the emergency procedures detailed in condition 9A, address and mitigate, as far as reasonably practical, the consequences of potential fire and hazmat incidents during demolition works and the potential health risks to firefighters undertaking emergency operations in relation to foreseeable fire/hazmat scenarios; b) ensure two copies of the emergency procedures detailed in condition a) above are located in demolition areas; c) ensure appropriate first aid firefighting equipment is provided on site; d) ensure that plant operators and demolition contractors are trained to undertake first aid firefighting in the event of an incident; and e) ensure that comprehensive and specific risk control measures are developed and implemented for Scenario 5 detailed in Table 3, Section 4 of the HAZDEM. The control measures developed must incorporate comprehensive training of demolition contractors in regard to the requirements for the control of ignition sources at the site.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Demolition completed outside of audit period. Assessed as compliant in 2021 IEA.	Complete
SOIL AND WATER				
Discharge of Water				
C10	The Development shall comply with section 120 of the Protection of the Environment Operations Act 1997, which prohibits the pollution of waters, except as expressly provided in an EPL.	Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025 Annual Reviews 2021 - 2025	Ampol reported it was non-compliant against this condition in its 2021-2022 Annual Return and its 2022 Annual Review based on an oily-water overflow incident that occurred on 7/04/2022 that impacted waterways, wetlands and surrounding land in Kurnell. The EPA issued Ampol with a Clean Up Notice on 8/04/2022 specifying immediate clean up actions. These were completed by Ampol and the	Non-compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
		<p>EPA Clean Up Notice (3502297) 8/04/2022</p> <p>EPA letter dated 8/08/2025 re Clean Up Notice 3502297</p> <p>EPA Clean Up Notice (3505381) 16/08/2023</p> <p>EPA letter dated 30/04/2025 re Clean Up Notice 3505381</p> <p>Enforceable Undertaking 30/08/2023</p> <p>Variation of Enforceable Undertaking to extend project deliverable timeframes 24/02/2025</p> <p>Greater Sydney Landcare Final Report to Ampol re Streamwatch program 2026</p> <p>SCC Final Report to Ampol re completion of Marton Park projects 29/01/2026</p> <p>Environmental Incidents March 2021 – Feb 2022</p>	<p>Clean Up Notice considered closed by the EPA by letter dated 8/08/2022. Ampol also entered into an Enforceable Undertaking with the EPA which required it to fund four community projects to a total of \$700,000. Ampol provided the required funding and three of the four projects were completed and final reports provided to the EPA. The NPWS project to regenerate Kamay Botany National Park was ongoing with a variation to the Enforceable Undertaking approving an extension of the timeframe for completion to 31/12/2026.</p> <p>A further Clean Up Notice was issued by the EPA on 16/08/2023 on the suspicions that the oily water incident polluted the Mangrove Area potentially causing the observed mangrove dieback. This Clean-Up Notice required Ampol to engage an ecologist to monitor and assess the impact of the incident on mangrove health in the Mangrove Area. This was undertaken by environmental consultants WSP and a report submitted to the EPA on 23/05/2024. The EPA stated by letter dated 30/04/2025 that it reviewed the report and additional information requested and concluded that Ampol complied with the Clean Up Notice.</p> <p>The EPA requested continued monitoring of the Mangrove Area, Ampol agreed to conduct a limited follow up assessment of the impacted area in the mangroves.</p> <p>A further incident was reported to the EPA relating to an oily sheen emanating from a ship (POLAR BRIGHT) berthed at the Kurnell Wharf. This incident could be considered to have caused pollution of waters, however the source of the pollution was the ship and not Ampol infrastructure. Following submission of the incident report to the EPA, no further requests / actions were taken.</p> <p>Ampol demonstrated its LPS system to the auditors. The LPS is used for the recording and tracking of incidents. An extract was provided of loss and near loss incidents for the Kurnell Terminal for the period. A review of this extract did not identify other incidents that may have caused pollution of waters. Refer to this IEA report Section 3.1.2 for further discussion of incidents.</p> <p>A review of the EPA Annual Returns and the Annual Reviews did not identify any exceedances of the limits specified in the EPL for discharges to water at the licensed discharge point. Refer to EPL Condition L3.4.</p> <p>Based on the incident which occurred on 7/04/2022 and caused the pollution of waters, this condition has been assessed as non-compliant. However, as clean-up actions have been completed and further improvements made to the wastewater treatment system, no recommendations are made.</p>	
Erosion and Sediment Control				

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
C11	During the construction and demolition works associated with the Development, the Applicant shall implement suitable erosion and sediment control measures on-site, in accordance with the relevant requirements in the latest version of the Managing Urban Stormwater: Soils and Construction Guideline and the relevant Management and Mitigation measures contained within Appendix C of this consent.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Construction and demolition works completed outside audit period. Assessed as compliant in 2021 IEA.	Complete
Imported Soil				
C11A	<p>The Applicant shall:</p> <ul style="list-style-type: none"> a) ensure that only VENM or any other material approved in writing by the EPA issued as fill in the Eastern ROW and Western ROW; b) ensure that the material used as backfill for Silver Beach is of similar grain size and colour characteristics; c) be permitted to use only VENM or any other material that meets all of the conditions of a Resource Recovery Order issued by the EPA under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> for use in the Caltex Terminal. d) ensure that any VENM or other materials used by the Applicant are fit for purpose and are only used as specified by the relevant Resource Recovery Exemption issued by the EPA. e) keep accurate records of the volume and type of fill to be used; and f) make these records available to the Department upon request. 	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Filling activities completed outside of audit period and assessed as compliant in 2021 IEA.	Complete
C11B	During demolition works, the Applicant shall implement erosion and sediment control measures for managing temporary stockpiles, in accordance with the relevant requirements in the latest version of the <i>Managing Urban Stormwater: Soils and Construction – Volume 1</i> and the relevant Management and Mitigation measures contained within Appendix C of this consent.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Demolition works completed outside audit period. Assessed as compliant in 2021 IEA.	Complete
Water Management Plan				
C12	<p>The Applicant shall prepare and implement a Water Management Plan for the Development to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with the EPA; (b) be approved by the Secretary (refer to Conditions D1 and D2 for timing); 	<p>OEMP V 2.0 10/09/2021 Appendix J SWMP</p> <p>DPHI letter dated 08/04/2021 approving OEMP and sub plans</p> <p>OEMP V3.0 9/02/2026 Appendix J SWMP</p>	<p>A Soil and Water Management Plan (SWMP) has been prepared for the operation of the Kurnell Terminal and is included as sub plan to OEMP.</p> <p>The OEMP (V2.0 03/03/2021) and associated sub plans was approved by DPHI by letter dated 8/04/2021. The letter noted the review included the Soil and Water Management Sub Plan required by Condition C12.</p>	Compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	<p>(c) In addition to the standard requirements for management plans (see Condition D3), this plan must include a Surface Water Management Plan, that:</p> <ul style="list-style-type: none"> includes a description of the water management system on site, including the: <ul style="list-style-type: none"> stormwater system; and, oily water / wastewater system. includes plans for the above two components of the systems: Demonstrates compliance with any requirements of the EPL and/or the EPA. 	<p>Major Project portal acknowledgment of receipt of OEMP V3.0 on 9/02/2026</p> <p>Site inspection observations</p>	<p>A description of the stormwater and oily water management is included in Section 2.5.6 of the OEMP.</p> <p>Stormwater drainage system and oily water system schematic plans are included in Appendix A of the OEMP.</p> <p>The OEMP and SWMP include the requirements of the EPL. Compliance with the EPL is reported each year in the Annual Returns submitted to the EPA.</p> <p>A revised OEMP (V3.0 9/02/2026) was submitted to DPHI via the Major Projects portal on 9/02/2026. The revised OEMP included a revised SWMP which described the upgrades made to the stormwater system following the April 2022 loss of containment event. Ampol reported that the upgrades were agreed with the EPA. The upgrades were delivered under the EPL as PRP U28 (Stormwater Management System Upgrade). This included the installation of a levee wall around the WWTP designed to prevent loss of hydrocarbons in a 1:500 year flood event, new stormwater retention pits at pipeway A and pipeway B with automated pumping systems, new automated pumping station at the B1A basin and at the intermediate separators.</p> <p>The stormwater system and oily water system were observed during the audit site inspection, including the upgraded works.</p>	
C12A	<p>The Applicant shall update and implement the Soil and Water Management Plan for <u>demolition</u> works to the satisfaction of the Secretary. This plan is to update the plan approved under condition C12 and shall also:</p> <ul style="list-style-type: none"> (a) be submitted to the Secretary for approval (See condition D1A for timing); (b) include a description of soil and water issues associated with the demolition works; (c) include measures for managing soils that are excavated and stockpiled on site including erosion and sediment control measures for stockpiles and disturbed areas; (d) include details of water management and monitoring requirements during demolition works; and (e) include procedures for corrective action in the event that potential contaminants of concern are identified in the groundwater from the quarterly groundwater monitoring program. 	<p>2021 IEA Report, Lloyd's Register LRQA, August 2021 V3</p>	<p>Assessed as complete in previous IEAs.</p>	<p>Complete</p>
Groundwater				
C13	<p>In the event that groundwater is intersected during <u>construction and demolition</u> works the Applicant shall:</p>	<p>2021 IEA Report, Lloyd's Register LRQA, August 2021 V3</p>	<p>Assessed as complete in previous IEAs.</p>	<p>Complete</p>

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	<ul style="list-style-type: none"> (a) obtain the necessary water related approvals from NOW; (b) develop a Groundwater Management Plan for the testing, dewatering, storage, movement and treatment of any groundwater in consultation with the NOW, to the satisfaction of the Secretary. 			
Acid Sulphate Soils (ASS) Management Plan				
C14	<p>If Acid Sulfate Soils (ASS) are encountered during construction and demolition works, the Applicant shall take steps to prevent further oxidation of exposed ASS and will cease all work until an ASS Management Plan is prepared for the Development to the satisfaction of the Secretary. This Plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with the EPA and Council by a suitably qualified and experienced expert; (b) be approved by the Secretary prior to the continuation of any excavation works; (c) outline the investigations that have be undertaken to test for the presence of ASS in accordance the NSW State Government's Acid Sulphate Soils Manual (ASSMAC 1998); (d) detail the protocols to be put in place and followed; (e) detail how the ASS will be tested, handled and stockpiled; (f) detail measures to prevent erosion and sedimentation of ASS; and, if necessary (g) outline how the ASS will be disposed of off-site (e.g. at a licensed facility). 	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Construction and demolition works completed outside audit period. Assessed as compliant in 2021 IEA.	Complete
Contamination Management				
C15	<p>The Applicant shall prepare and implement a Contamination Management Plan for the Development prior to commencement of <u>construction</u>. The Plan shall:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with the EPA and NSW Health; (b) be to the satisfaction of the Secretary (refer to Condition D1 for timing); (c) outline measures for managing potentially contaminated soil and groundwater, including soil testing, classification, handling, storing and disposal; (d) detail the measures that will be employed to prevent erosion and sedimentation of contaminated soil; 	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete previous IEAs.	Complete

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	<p>(e) detail measures for periodically testing surface water run-off that may accumulate during excavation works for elevated levels of contamination, with any water that is found to have elevated levels of contaminants being disposed of via the on-site Wastewater Treatment Plant.</p> <p>(f) detail measures for managing asbestos encountered during works, including disturbances of soil and release of asbestos into the air;</p> <p>(g) outline how contaminated soil and water would be classified and disposed of in accordance with the <i>Protection of the Environment Operations Act 1997</i> and associated regulations and characterised in accordance with the <i>EPA's Waste Classification Guidelines</i>.</p> <p>g) Detail how the storage ,disposal and transport of asbestos waste would be undertaken in with the Protection of the Environment Operations (Waste) regulations ; and</p> <p>h) assess any likely impact on existing remediation projects and, if any impacts are identified, provide details as to the measure that shall be taken to reduce or avoid that impact.</p>			
C15A	<p>The Applicant shall update and implement the Contamination Management Plan for the demolition works to the satisfaction of the Secretary. This plan is to update the plan approved under condition C15 and shall also:</p> <p>a) be submitted to the Secretary for approval (See condition D1A for timing);</p> <p>b) detail measures for the identification and monitoring of potentially contaminated soils and groundwater including the use of excavation visual and olfactory indicators; and</p> <p>c) include measures for managing potentially contaminated soils and groundwater during ground disturbance and excavation works.</p>	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Assessed as complete previous IEAs.	Complete
Asbestos Management				
C15B	<p>The Applicant shall ensure that any asbestos encountered during the demolition works is monitored, handled, transported and disposed of by appropriately qualified and licensed contractors in accordance with requirements of Workcover and relevant guidelines, including:</p> <p>a) <i>Work Health and Safety Regulation 2011</i>;</p>	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Demolition works completed outside audit period. Assessed as compliant in 2021 IEA.	Complete

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations									
	<p>b) <i>Model Code of Practice – How to Manage and Control Asbestos in the Workplace, 2011 Safe Work Australia</i></p> <p>c) <i>Model Code of Practice – How to Safely Remove Asbestos, 2011 Safe Work Australia; and</i></p> <p>d) <i>Protection of the Environment (Waste) Regulation 2005.</i></p>												
NOISE AND VIBRATION													
Construction Noise Limits													
C16	<p>The Applicant shall ensure that the construction noise generated by the development does not exceed the criteria in Table 2 below.</p> <p><i>Table 2: Construction Noise Criteria (dB(A))</i></p> <table border="1"> <thead> <tr> <th>Location</th> <th>Day LA_{eq} (15min)</th> <th>Evening LA_{eq} (15 min)</th> </tr> </thead> <tbody> <tr> <td>R2-30D Cook Street</td> <td>46</td> <td>40</td> </tr> <tr> <td>At any other residence or other noise sensitive receiver</td> <td>50</td> <td>45</td> </tr> </tbody> </table>	Location	Day LA _{eq} (15min)	Evening LA _{eq} (15 min)	R2-30D Cook Street	46	40	At any other residence or other noise sensitive receiver	50	45	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Construction works completed outside audit period. Assessed as compliant in previous IEAs.	Complete
Location	Day LA _{eq} (15min)	Evening LA _{eq} (15 min)											
R2-30D Cook Street	46	40											
At any other residence or other noise sensitive receiver	50	45											
Operational Noise Limits													
C17	<p>The Applicant shall ensure that the operational noise generated by the Development does not exceed the Criteria for residential receivers are summarised in Table 3 below:</p> <p>Table 3: Operational Noise Limits dB(A)</p> <table border="1"> <thead> <tr> <th>Location</th> <th>Day LA_{eq} (15min)</th> <th>Evening LA_{eq} (15min)</th> </tr> </thead> <tbody> <tr> <td>At any private residential receiver</td> <td>60</td> <td>50</td> </tr> </tbody> </table> <p>Notes:</p> <ul style="list-style-type: none"> To identify a residential receiver location, refer to Appendix F of the EIS Noise generated by the Development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy These criteria have been developed for this specific Development; however it is recognised that the site is zoned for heavy industrial purpose and that ultimately the 	Location	Day LA _{eq} (15min)	Evening LA _{eq} (15min)	At any private residential receiver	60	50	<p>Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025</p> <p>2021-2025 Annual Reviews</p> <p>Demonstration of SoundScience monitoring system at Wharf</p> <p>Email to EPA dated 22/12/2025 re shipping noise exceedance</p> <p>Email to EPA dated 4/12/2025 re noise complaint and shipping noise exceedance</p> <p>Email to EPA dated 25/07/2025 re shipping noise exceedance</p>	<p>Noise exceedances are identified through the SoundScience 'SmartData' monitoring system installed at the wharf which continuously monitors and records noise levels, audio and coinciding meteorological data. The system uses the measured wharf noise levels and meteorological conditions to predict real-time noise levels at the six residential receivers located on Prince Charlse Parade, Kurnell. The SoundScience system was observed during the audit site inspection, and the Shore Officer explained how the system is used.</p> <p>Ampol reported exceedances of the night-time noise limits due to shipping noise in its Annual Reviews and Annual Returns to the EPA. The following exceedances were reported:</p> <ul style="list-style-type: none"> 2 occasions in 2021 4 occasions in 2022 5 occasions in 2023 6 occasions in 2024 7 occasions in 2025 <p>In addition, exceedances have been recorded on two occasions in 2026 (January and February).</p> <p>The noise exceedances were reported to the EPA via email. Ampol reported that it ceased notifying DPHI of noise exceedances in 2022</p>	Non-compliant			
Location	Day LA _{eq} (15min)	Evening LA _{eq} (15min)											
At any private residential receiver	60	50											

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations												
	amenity of the area should be controlled by the criteria contained in Table 2.1 of the Industrial Noise Policy.		<p>following correspondence from DPHI that notification was no longer required.</p> <p>The exceedances reported in 2025 coincided with a large number of community complaints that related to excessive noise from two sister ships that were berthed one after the other at the Kurnell Wharf in July 2025. In response to the complaints, the EPA included a special condition which requires the review of shipping noise protocols. Refer to EPL Condition E4 (SC E21: Review of Shipping Noise Protocols) for further details.</p> <p>Ampol has implemented a range of measures to reduce impacts from shipping noise (discussed in this IEA report Section 3.1) and is complying with the requirements of the EPA to review shipping noise. Based on the exceedances recorded, this condition has been assessed as non-compliant, however given the measures implemented by Ampol and that the EPA is reviewing the issue and may implement further licence conditions regarding noise management, no recommendations are made.</p>													
	Hours of Construction Demolition and Operation															
C18	<p>With exception of the works identified in conditions C19 and C20, the Applicant shall comply with the hours detailed in table 4.</p> <p><i>Table 4: Construction, Demolition & Operation Hours</i></p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Time</th> </tr> </thead> <tbody> <tr> <td>Construction</td> <td>Monday - Sunday</td> <td>7.00am – 10.00pm</td> </tr> <tr> <td>Demolition</td> <td>Monday - Sunday</td> <td>7.00am – 10.00pm</td> </tr> <tr> <td>Operation</td> <td>Monday - Sunday</td> <td>24 hours</td> </tr> </tbody> </table>	Activity	Day	Time	Construction	Monday - Sunday	7.00am – 10.00pm	Demolition	Monday - Sunday	7.00am – 10.00pm	Operation	Monday - Sunday	24 hours	Interviews with site personnel	<p>Construction and demolition activities were completed outside audit period.</p> <p>The Kurnell Terminal operates 24 hours a day, seven days per week. High noise works, such as excavation works for remediation purposes or lawn mowing in Right of Ways were reported to be restricted to 7am-6pm Monday to Saturday.</p>	Compliant
Activity	Day	Time														
Construction	Monday - Sunday	7.00am – 10.00pm														
Demolition	Monday - Sunday	7.00am – 10.00pm														
Operation	Monday - Sunday	24 hours														
C19	High noise generating construction and demolition works, including the pipeline removal works within the Eastern and Western Right of Ways and the Tank 101 demolition works described in MOD3, shall be confined to less sensitive times of the day, and shall not be undertaken on Sundays or public holidays or outside of the hours 7.00am and 6.00pm Monday to Saturday.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Construction and demolition works completed outside audit period. Assessed as compliant in previous IEAs.	Complete												
C20	Construction works outside of the work hours identified in condition C18 above may be undertaken in the following circumstances:	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Construction works completed outside audit period. Assessed as compliant in previous IEAs.	Complete												

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	(a) works that are inaudible at nearest sensitive land receivers; (b) works that are consistent with Caltex's existing maintenance procedures and are in accordance with the existing EPL; (c) works agreed to in writing by the EPA or the Department; (d) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or (e) where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm.			
	Operating Conditions			
C21	The Applicant shall: (a) implement best management practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the proposal; (b) minimise the noise impacts of the development during adverse meteorological conditions when noise criteria do not apply; (c) maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired; and (d) regularly assess noise monitoring data and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.	OEMP V2.0 10/09/2021 Appendix J NMP Kurnell Terminal Wharf Noise Management Letter template Noise Management Plan for PANTELIS 5/02/2026 Noise Management Plan for PROTEUS BOHEMIA 17/11/2025 Noise Management Plan for PROTEUS REBECCA 11/12/2025 Noise Survey: Re-evaluation of Background / Ambient Noise Levels Post Refinery Demolition Works, Wilkinson Murray, 6/01/2020 Demonstration of SoundScience monitoring system Interviews with site personnel	Noise management and mitigation measures are outlined in the Noise Management Sub-Plan (NMP) which forms an appendix to the OEMP. Since the conversion to a Terminal, noise impacts from the site have reduced with shipping noise being the biggest contributor. Examples of measures implemented during the audit period include: <u>Wharf</u> <ul style="list-style-type: none"> Prior to ships berthing at Kurnell Wharf, they are provided with a Noise Management Letter. The letter provides the noise limits and lists the minimum measures expected to be implemented to minimise noise whilst ships are berthed at the Wharf. The letter outlines that a Noise Management Plan is required to be prepared by the ship captain and submitted to the Terminal prior to berthing. Examples of Noise Management Plans were sighted for the ships: PANTELIS, PROTEUS REBECCA and PROTEUS BOHEMIA. The Noise Management Plans for the PROTEUS REBECCA and PROTEUS BOHEMIA were prepared in November and December 2025 and reflected the lessons learnt following the complaints received regarding the sister ships, HAFNIA LARVIK and HAFNIA LILLESAND (discussed further in this IEA report Section 3.1). This includes committing to the installation of echo barriers around tonal noise sources (funnel fire dampers, blower room, Inert Gas system pipelines and deck seals, pump room exhaust fans). The Plans were detailed and included photographs of the proposed locations of echo barriers, as well as other mitigation measures relating to cargo operations, the management of machinery / pumps / ventilation and crew training and watch keeping. The SoundScience monitoring system was observed to be operational at the Wharf. At the time of the audit site inspection no 	Compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
			<p>ships were berthed at the Wharf and the noise levels were reading around 40 dBA.</p> <ul style="list-style-type: none"> The SoundScience monitoring system monitors weather conditions to facilitate noise management during adverse meteorological conditions. The Shore Officer demonstrated how the SoundScience monitoring system was used and explained that since 2024, ships are provided with a Wi-Fi box that allows the ship captain to log onto SoundScience so that they can also monitor noise levels while they are berthed at Kurnell. The Shore Officer reported that if noise levels approach the noise limits, they are in communication with the ship captain to make decisions to reduce noise impacts (such as reducing the pumping discharge rate or ceasing pumping altogether). If the noise limit is exceeded then a Letter of Protest is issued to the ship captain. <p><u>Terminal</u></p> <ul style="list-style-type: none"> Plant and equipment maintained through M7/M8 process Weather conditions and forecasts monitored High noise works such as lawn mowing in Right of Ways or excavation as part of remediation works restricted to 7am-6pm Monday to Saturday A noise survey, completed in 2020 by acoustic consultants Wilkinson Murray to redetermine baseline noise levels following the completion of demolition works and ACS cell capping, found that Terminal activities had no discernible influence on the measured noise levels at the eight monitoring locations surrounding the site. 	

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	Noise Management Plan			
C22	<p>The Applicant shall prepare and implement a Noise Management Plan for construction works and <u>site operations</u>. The plan (s) shall:</p> <ul style="list-style-type: none"> (a) be prepared and implemented by a suitably qualified and experienced person, in consultation with the EPA; (b) be approved by the Secretary (refer to Conditions D1 and D2 for timing); (c) describe the measures that will be implemented to minimise noise from the construction and operation of the development including: <ul style="list-style-type: none"> · all reasonable and feasible measures being employed on site; · maintain equipment to ensure that it is in good order; · traffic noise is effectively managed; and · the noise impacts of the development are minimised during any meteorological conditions when the noise criteria in this consent do not apply; · identification of high noise generating construction activities, including proposed times when these works will be carried out (including respite periods if required) and mitigation measures to minimise adverse impacts from these activities; · compliance with the relevant conditions of this consent. (d) includes a noise monitoring program that: <ul style="list-style-type: none"> · shall be carried out until otherwise agreed to in writing by the Secretary; · is capable of evaluating the performance of the Development; and <p>includes a protocol for determining exceedances of the relevant conditions of this consent and responding to complaints.</p>	<p>OEMP V2.0 10/09/2021 Appendix J NMP</p> <p>DPHI letter dated 08/04/2021 approving OEMP and sub plans</p> <p>OEMP V3.0 9/02/2026 Appendix J NMP</p> <p>Major Project portal acknowledgment of receipt of OEMP V3.0 on 9/02/2026</p>	<p>The NMP for site operations is included as an appendix to the OEMP. The OEMP (V2.0 03/03/2021) and associated sub plans was approved by DPHI by letter dated 8/04/2021. The letter noted the review included the Noise Management Sub Plan required by Condition C22.</p> <p>A revised OEMP (V3.0 9/02/2026) was submitted to DPHI via the Major Projects portal on 9/02/2026.</p> <p>The NMP describes control and mitigation measures for the management of operational noise.</p> <p>The NMP describes the noise monitoring program for monitoring shipping noise and evaluating compliance with the noise criteria.</p> <p>The NMP discusses noise complaints and refers to Section 5.6 of the OEMP for further discussion of complaint management.</p> <p>Refer C21 for discussion of implementation of NMP.</p>	<p>Compliant</p> <p>Refer 2026 IEA OFI 03, 2026 IEA OFI 04, 2026 IEA OFI 05 and 2026 IEA OFI 06</p>
C22A	<p>The Applicant shall update and implement the Noise Management Plan for the demolition works to the satisfaction of the Secretary. This plan is to update the plan approved under condition C22 and shall also:</p> <ul style="list-style-type: none"> a) be approved by the Secretary (refer to conditions D1A and D2 for timing); b) outline the procedures for the notification of all potentially affected persons at least one week prior to and during high noise generating works; 	<p>2021 IEA Report, Lloyd's Register LRQA, August 2021 V3</p>	<p>Demolition works completed outside audit period. Assessed as compliant in 2021 IEA.</p>	<p>Complete</p>

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	<p>c) implement reasonable and feasible noise and vibration management and mitigation measures during demolition activities within the Caltex Terminal;</p> <p>d) implement reasonable and feasible noise and vibration monitoring and management measures during removal of pipelines from the Eastern and Western ROW to minimise noise and vibration impacts generated by the pipeline removal works; and include strategies for monitoring vibration impacts on buildings with medium to high heritage significance proposed to be retained within the Caltex Terminal.</p>			
	Construction Vibration			
C23	<p>The Applicant shall aim to achieve the following construction and demolition vibration goals:</p> <p>(a) for structural damage, the vibration limits set out in the <i>German Standard DIN 4150-3: Structural Vibration - effects of vibration on structures</i>; and</p> <p>(b) (b) for human exposure, the acceptable vibration values set out in the <i>Environmental Noise Management Assessing Vibration: A Technical Guideline (Department of Environment and Conservation, 2006)</i>.</p>	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Construction and demolition works completed outside audit period. Assessed as compliant in previous IEAs.	Complete
	AIR QUALITY MANAGEMENT			
	Dust Generation During Construction			
C24	The Applicant shall carry out all reasonable and feasible measures to minimise dust generated during <u>construction works and demolition works</u> .	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Construction and demolition works completed outside audit period. Assessed as compliant in previous IEAs.	Complete
C25	<p>During construction and demolition works, the Applicant shall ensure that:</p> <p>(a) all trucks entering or leaving the site have their loads covered;</p> <p>(b) trucks associated with the Development do not track dirt onto the public road network; and</p> <p>(c) any dirt on public roads as a result of the development is promptly removed.</p>	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Construction and demolition works completed outside audit period. Assessed as compliant in previous IEAs.	Complete
	Offensive Odour			
C26	The Applicant shall not cause or permit the emission of offensive odours from the site, as defined under Section 129 of the POEO Act.	Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025	Ampol received 151 complaints relating to odour during the audit period (these are discussed further in this IEA report Section 3.1). Based on the number of complaints received, Ampol reported it was non-compliant with this requirement in its Annual Returns to the EPA in 2021-2022, 2022-2023, 2023-2024 and 2024-2025.	Non-compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
			<p>In response, Ampol implemented a number of measures to reduce odour impacts from its operations. This included implementing a Wastewater Treatment Plant Odour Abatement Program included as EPL Special Condition (SC E19) which was considered completed and moved to the completed programs under EPL Condition G3.1 by the EPA in November 2025. The EPA noted that it may revisit SC E19 should further works be required to limit odours.</p> <p>Based on the measures implemented by Ampol to address odour in consultation with the EPA, no recommendations are made as part of this audit.</p> <p>Refer to this IEA report Section 3.1 for further discussion of odour and complaints.</p>	
	Operating Conditions			
C27	<p>The Applicant shall:</p> <p>(a) implement all reasonable and feasible dust and odour mitigation measures to prevent and minimise odour and dust emissions from operations;</p> <p>(b) prevent and minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events;</p> <p>(c) minimise any visible off-site air pollution; and</p> <p>(d) minimise surface disturbance of the site, other than as permitted under this consent.</p>	<p>OEMP V 2.0 10/09/2021 Appendix J AQMP</p> <p>Site inspection observations</p> <p>Interviews with site personnel</p> <p>SWMS 2527 Tank 1 Zone 1 Phase 2 ACM Remediation, Manns Earthmoving Co 19/02/2026, Rev 2</p> <p>WWTP Daily Odour Assessment 05/05/2025 – 9/08/2025</p> <p>Oily Water Drain and Pit Cleaning Work Instruction (CD19504), V1, 01/07/2024</p> <p>Oily Wastewater Maintenance 12 Monthly Procedure (CD6662). V2, 15/08/2024</p>	<p>Dust and odour mitigation measures are included in the Air Quality Management Sub-Plan (AQMP) which forms an appendix to the OEMP.</p> <p>During the site inspections, when wind was light:</p> <ul style="list-style-type: none"> • There was no visible dust • Dirt was not observed to be tracked on public roads • No odour was detected at the site boundary • A very mild odour was detected adjacent to the WWTP. <p>Examples of measures implemented during the audit period include:</p> <p><u>Dust</u></p> <ul style="list-style-type: none"> • Speed limit observed to be 25 km/hr on internal roads. • Groundcover was present on many unsealed surfaces • Meteorological conditions were monitored at the Wharf. Windsocks were observed at the Terminal to indicate wind direction. • The Safe Work Method Statement (SWMS) provided by Manns Earthmoving for excavation works associated with ACM remediation in the vicinity of Tank 1 included the following controls for mitigating dust: use water for dust suppression and compaction as required, stockpiles to be watered, sprayed or covered where required to minimise nuisance dust, plant / vehicles must be cleaned before leaving work area. <p><u>Odour</u></p> <ul style="list-style-type: none"> • VapourGard odour abatement system installed at the WWTP and at the northern gasoline tanks. The system works to neutralise odours by moving air across a tank of deodoriser to create a dry vapour. The VapourGard system was observed to be in operation during the audit site inspection. 	<p>Compliant</p> <p>Refer 2026 IEA OFI 08</p>

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
			<ul style="list-style-type: none"> Covers were installed on the retention basin at the WWTP (observed during audit site inspection). Instrumentation (Coriolis meter) was installed on water draw outlets of Tanks 102, 103 and 104 to minimise hydrocarbon release during tank water draws. Repairs were completed on the oily water sewer at Tanks 102, 103 and 104 to mitigate the potential for hydrocarbon overflow into bunds and potentially generating odour. Oily water sewer systems are reportedly inspected at regular intervals minimising silting of sewer drains and pits (Work Instruction and Procedure sighted). Odour surveys were conducted daily at four locations around the WWTP representing the nearest residences at Solander Street, Recreational Club, South and East (examples sighted). <p>Refer also to this IEA report Section 3.1 for further discussion of odour and complaints.</p>	
	Air Quality Management Plan			
C28	<p>The Applicant shall prepare and implement an Air Quality Management Plan for the proposed <u>construction</u> works. The plan shall:</p> <ul style="list-style-type: none"> (a) be prepared and implemented by a suitably qualified and experienced expert in consultation with the EPA and NSW Health; (b) be approved by the Secretary (refer to Condition D1 for timing); (c) describe the measures that would be implemented on site to ensure: <ul style="list-style-type: none"> i. the control of air quality and odour impacts of the Development; ii. that these controls remain effective over time; iii. that all reasonable and feasible air quality management practices is employed; iv. the air quality impacts are minimised during adverse meteorological conditions and extraordinary events; and v. compliance with the relevant conditions of this consent. (d) describes the air quality & odour management system; (e) includes an air quality monitoring program that: <ul style="list-style-type: none"> i. is capable of evaluating the performance of the proposal; ii. includes a protocol for determining any exceedances of the relevant conditions of consent and responding to complaints; 	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Construction works completed outside audit period. Assessed as compliant in previous IEAs.	Complete

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	iii. adequately supports the air quality management system; and iv. evaluates and reports on the effectiveness of the air quality management system.			
C28A	The Applicant shall update and implement the Air Quality Management Plan for the <u>demolition works</u> to the satisfaction of the Secretary. This plan is to update the plan approved under condition C28 and shall also: (a) be approved by the Secretary (refer to conditions D1a and D2 for timing); (b) outline procedures for VOC, odour and dust deposition monitoring and suppression methods during excavation works and where potential hydrocarbon contamination is present; and include dust suppression measures and procedures for dust monitoring during operation of the concrete crusher.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Demolition works completed outside audit period. 2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Complete
	Air Quality Verification			
C29	The Applicant shall carry out an air quality verification study for the development. The study shall: (a) be prepared by a suitably qualified expert; (b) be completed within 24 months of the commencement of operations or as otherwise agreed to by the Secretary; (c) be based on the average of emissions over a continuous 12 month period after commencement of operations, taking into account the throughput and type of fuel; (d) include a validation of the accuracy of the modelling predictions in the EIS; (e) verify that compliance with any limits or conditions in the EPL are achieved; (f) verify, using reasonable means, the effectiveness of any emission control measures that have been implemented to minimise air quality impacts; and demonstrate compliance with the relevant regulatory criteria.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Completed outside audit period. Assessed as compliant in 2021 IEA.	Complete
	HERITAGE MANAGEMENT			
	Archival Record			
C30	The Applicant shall commission an appropriately qualified heritage expert to undertake an archival photographic recording of the existing fabric and operation of the Kurnell Refinery while the plant is still operational and during the decommissioning process. The recording should include a range of media and shall be undertaken in accordance with the current Heritage Council Guidelines on Photographic	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Archival recording completed outside audit period. Assessed as compliant in previous IEAs.	Complete

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	Recording of Heritage Items Using Film or Digital Capture (2006). The archival recording shall be submitted to the Heritage Council of NSW, Sutherland Shire Library and the NSW State Library within 12 months of the closure of the refinery and prior to the removal or demolition of any existing elements.			
	Heritage Management Strategy			
C31	The Applicant shall prepare and implement a Heritage Management Strategy for the Australian Oil Refinery site prior to shut-down of the refinery plant. The Strategy must: <ul style="list-style-type: none"> (a) be prepared by a suitably qualified person in consultation with Council and the Heritage Council of NSW; (b) be submitted to the Secretary for approval at least 2 months prior to the shut-down of the refinery plant; (c) review the heritage significance of the Australian Oil Refinery site; and (d) set out a framework to minimise or mitigate the loss of heritage value during the decommissioning process, and for the ongoing management of the Site's heritage during present and future works. 	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Heritage Management Strategy implemented outside audit period. Assessed as compliant in 2021 IEA.	Complete
C31A	The Applicant shall: <ul style="list-style-type: none"> (a) continue to implement the Heritage Management Strategy prior to and during the demolition works; and (b) implement the recommendations stated in Chapter 4 and 5 of the document titled: <i>Caltex Kurnell Refinery Demolition: Heritage Impact Statement by Australian Museum Consulting for URS Australia Pty Ltd, October 2014.</i> 	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Heritage Management Strategy implemented outside audit period. Assessed as compliant in 2021 IEA.	Complete
	Other Heritage Management and Mitigation Measures			
C32	The Applicant shall, prior to shut-down of the refinery: <ul style="list-style-type: none"> (a) form an in- house team to manage documentation and interpretation of the history of the refinery, including the production of a colour book; (b) liaise with the Mitchell Library to prepare a photographic record of the site and people associated with the refinery for inclusion in the library's archives; and (c) engage a professional photographer to prepare a photographic exhibition of the refinery. The location(s) and duration of the exhibition shall be to the satisfaction of Council and the NSW Heritage Council. 	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Completed outside audit period. Assessed as compliant in previous IEAs.	Complete

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
32A	Within two months of its scheduled demolition, the Applicant shall undertake a final review of the adaptive reuse capabilities of highly significant buildings which are proposed to be demolished as per the recommendations of the Heritage Management Strategy.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Completed outside audit period. Assessed as compliant in previous IEAs.	Complete
32B	Within two months of its scheduled demolition, the Applicant shall complete appropriate archival records of items to be demolished as per the recommendations of the Heritage Management Strategy and other initiatives supported by the Heritage Division of the OEH.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Completed outside audit period. Assessed as compliant in previous IEAs.	Complete
	Potential for Discovery of Aboriginal and Non-Aboriginal Heritage Objects			
C33	If during the course of construction and demolition the Applicant becomes aware of any previously unidentified heritage object(s), all work likely to affect the object(s) shall cease immediately and the Heritage Council of New South Wales shall be notified immediately in accordance with section 146 of the Heritage Act 1977. Relevant works shall not recommence until written authorisation from the Heritage Council of NSW is received by the Applicant.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Construction and demolition works completed outside audit period. Assessed as compliant in 2021 IEA.	Complete
C34	If during the course of construction and demolition the Applicant becomes aware of any previously unidentified Aboriginal object(s), all work likely to affect the object(s) shall cease immediately and the OEH informed in accordance with section 89A of the National Parks and Wildlife Act 1974. Relevant works shall not recommence until written authorisation from OEH is received by the Applicant.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Construction and demolition works completed outside audit period. Assessed as compliant in 2021 IEA.	Complete
	Energy Efficiency and Greenhouse Gas Emission			
	Managing Energy Efficiency & Greenhouse Gas Emissions			
C35	The Applicant shall implement all reasonable and feasible measures to minimise: (a) energy use; and (b) greenhouse gas emissions, throughout the life of the development, to the satisfaction of the Secretary.	OEMP V2.0 10/09/2021 DPHI letter dated 08/04/2021 approving OEMP and sub plans OEMP V3.0 9/02/2026 Interviews with site personnel	Section 7.2.2 of the OEMP states that Ampol has been working for several years to develop strategies to help the company meet the challenge of climate change. Within the Distribution business unit (of which Kurnell Terminal belongs) the main emission sources are identified as fuel use and electricity consumption. The AQMP includes the objective to minimise energy use and minimise greenhouse gas emissions. The AQMP (and OEMP) however do not identify measures to reduce energy use and greenhouse gas emissions. The OEMP (including the AQMP) was approved by DPHI by letter dated 8/04/2021.	Compliant Refer 2026 IEA OFI 07

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
			<p>Ampol has developed a company-wide Sustainability Strategy 2023-2025 which is available on the Ampol public website. The Strategy identifies goals and deliverables for decarbonisation across the business.</p> <p>Ampol reported that during the audit period, the lighting in the Terminal Office building was replaced with LED lights as were the high bay lights in the workshop and the flood lights at the WWTP and Oil Movement Centre areas. Ampol reported that as the existing lights in the tank farms fail, they are being replaced with LEDs.</p>	
	TRANSPORT AND ACCESS			
	Traffic Management Plan			
C36	<p>The Applicant shall prepare and implement a Traffic Management Plan <u>for the Development</u>, to the satisfaction of the Secretary. The plan must:</p> <p>(a) be prepared and implemented by a suitably qualified and experienced person;</p> <p>(b) be approved by the Secretary (refer to Conditions D1 and D2 for timing);</p> <p>(c) detail the measures that would be implemented to ensure road safety and network efficiency during construction and operation including (but not limited to):</p> <ul style="list-style-type: none"> · installation of signage and implementation of maximum speeds limits on internal roads; and · final details of the proposed traffic control measures. · details for rationalisation of the entry and exit to the site, particularly if the weigh bridge is no longer required, to improve the management of traffic and parking for members of the general public in this area <p>(d) include a plan showing the route to be used by heavy vehicles during construction and operation;</p> <p>(e) detail the access and parking arrangements for the site during construction and operation;</p> <p>(f) include a Driver Code of Conduct that details the traffic management measures to be implemented during construction and operation to:</p> <ul style="list-style-type: none"> · minimise the impacts of the development on the local and regional road network; · minimise conflicts with other road users; and · ensure truck drivers use specified routes. <p>(g) describe the measures that will be implemented to ensure:</p>	<p>OEMP V2.0 10/09/2021 Appendix J TMP</p> <p>DPHI letter dated 08/04/2021 approving OEMP and sub plans</p> <p>OEMP V3.0 9/02/2026 Appendix J TMP</p> <p>Major Project portal acknowledgment of receipt</p> <p>Site observations</p> <p>Interviews with site personnel</p> <p>Community Contact Log Register 2023-2025</p> <p>Cumulative Environmental Incidents_Kurnell Terminal_2022 (complaint register)</p>	<p>The Traffic Management Sub Plan (TMP) for site operations is included as an appendix to the OEMP.</p> <p>The OEMP (V2.0 03/03/2021) and associated sub plans was approved by DPHI by letter dated 8/04/2021. The letter noted the review included the Traffic Management Sub Plan required by Condition C36.</p> <p>A revised OEMP (V3.0 9/02/2026) was submitted to DPHI via the Major Projects portal on 9/02/2026.</p> <p>The TMP includes measures for road safety during operation of the site.</p> <p>A Site Parking and Access Map is included as Appendix 3 to the TMP.</p> <p>A Driver Code of Conduct is included as Appendix 1 to the TMP.</p> <p>The TMP discusses measures for review and continuous improvement.</p> <p>The TMP includes communication and engagement methods.</p> <p>During the site inspection, no dirt was observed to be tracked on public roads, and sufficient parking was available for employee and contractor personnel and heavy vehicles.</p> <p>Examples of measures implemented during the audit period include:</p> <ul style="list-style-type: none"> • Speed limit observed to be signposted as 25 km/hr on internal roads. • No complaints had been received in recent years relating to traffic impacts • Ampol reported that there had been no disruptions to traffic on local roads during the audit period 	Compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	<ul style="list-style-type: none"> · the nominated heavy vehicle route is used; · drivers adhere to the code of conduct; and · compliance with the relevant conditions of this consent. <ul style="list-style-type: none"> (h) include a program to monitor the effectiveness of these measures; and (i) (i) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes. 			
C36A	<p>The Applicant shall update and implement the Traffic Management Plan for the <u>demolition works</u> to the satisfaction of the Secretary. This plan is to update the plan approved under condition C36 and shall also:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with Council; (b) be approved by the Secretary (refer to conditions D1A for timing); (c) include the designated routes for demolition traffic to the demolition areas within the site; (d) include details of traffic management arrangements for the cooling water outlet and intake pipeline removal works within the road reserves; and (e) outline the procedures for the notification of all potentially affected persons prior to and during the pipeline removal works within the road reserves. 	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Construction and demolition works completed outside audit period. Assessed as compliant in 2021 IEA.	Complete
C36B	The Applicant shall ensure that the pipeline removal works along the road reserves on Captain Cook Drive, Prince Charles Parade and Cook Street are undertaken in consultation with Council and do not take place during public events or public holidays in Kurnell.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Pipeline removal works completed outside audit period. Assessed as compliant in 2021 IEA.	Complete
	Car Parking			
C37	The Applicant shall provide sufficient parking facilities on-site for construction, demolition and operational personnel, and heavy vehicles, to ensure that construction and operational traffic associated with the Development do not utilise public and residential streets or public parking facilities for parking.	Site observations Interviews with site personnel	Construction and demolition works were completed outside the audit period. Car parking facilities were observed to be sufficient for operational personnel. No overflow parking was observed on public and residential streets. No complaints or issues relating to operational car parking facilities were reported or identified during the IEA site inspection.	Compliant
C37A	Within 18 months after commencement of the demolition works, the Applicant shall: (a) complete a review, in consultation with Council, of the Cook Street approach to the Caltex Terminal site considering issues relating to signage, car parking arrangements, vehicle flows and the future of the weighbridge; and (b) include a timetable of implementation of	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Car parking review project completed outside audit period. Assessed in 2021 IEA.	Complete

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	the findings of this review. Note: The implementations of the findings of this review may require further approval under the EP&A Act.			
	WASTE MANAGEMENT			
	Waste Management On-Site			
C38	The Applicant shall (a) minimise the waste generated on site; and (b) ensure that the waste generated by the development is appropriately stored, handled and disposed of, to the satisfaction of the Secretary.	OEMP V 2.0 10/09/2021 Appendix J WMP DPHI letter dated 08/04/2021 approving OEMP and sub plans OEMP V3.0 9/02/2026 Appendix J WMP Major Project portal acknowledgment of receipt of OEMP V3.0 on 9/02/2026	A Waste Management Sub-Plan (WMP) has been prepared and forms an appendix to the OEMP. The WMP includes measures for minimising waste generated on site. The WMP includes measures for the storage, handling and disposal of waste. The OEMP (V2.0 03/03/2021) and associated sub plans was approved by DPHI by letter dated 8/04/2021. The letter noted the review included the Waste Management Sub Plan required by Condition C40. A revised OEMP (V3.0 9/02/2026) was submitted to DPHI via the Major Projects portal on 9/02/2026. Refer to C40 for discussion of implementation of the WMP.	Compliant
C39	The Applicant shall ensure that any waste generated on the site during <u>construction and demolition</u> is classified in accordance with the EPA's Waste Classification Guidelines and disposed of to a facility that may lawfully accept the waste.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Construction and demolition works completed outside audit period. Assessed in previous IEAs.	Complete
C39A	The Applicant shall ensure that all hazardous materials identified in the structures to be demolished are removed prior to demolition where it is safe and practical to do so.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Demolition works completed outside audit period. Assessed in previous IEAs.	Complete
C39B	The Applicant shall ensure that the reuse of any materials (including soil, scrap metal or building materials) on site must be fit for purpose and must not result in any adverse impacts to the environment.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Construction and demolition works completed outside audit period. Assessed as compliant in 2021 IEA.	Complete
C39C	Where it is safe and practical to do so, the Applicant should as far as practicable sort all waste materials generated during demolition works to maximise opportunities for the beneficial reuse and recycling of such waste materials.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Demolition works completed outside audit period. Assessed as compliant in 2021 IEA.	Complete
	Waste Management Plan			
C40	The Applicant shall prepare and implement a Waste Management Plan for the development to the satisfaction of the Secretary. This Plan shall: (a) be prepared in consultation with the EPA; (b) be approved by the Secretary (refer to timing in Conditions D1 and D2)	OEMP V2.0 10/09/2021 Appendix J WMP DPHI letter dated 08/04/2021 approving OEMP and sub plans OEMP V3.0 9/02/2026 Appendix J WMP	The WMP forms an appendix to the OEMP. The OEMP (V2.0 03/03/2021) and associated sub plans was approved by DPHI by letter dated 8/04/2021. The letter noted the review included the Waste Management Sub Plan required by Condition C40. A revised OEMP (V3.0 9/02/2026) was submitted to DPHI via the Major Projects portal on 9/02/2026. The WMP identifies key waste sources from operational activities.	Compliant 2026 IEA OFI 17 For waste that has been classified by environmental consultants (e.g. excavated material)

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	<p>(c) detail the type and quantity of waste to be generated by construction and operational phases of the development;</p> <p>(d) detail the materials to be reused or recycled, either on or off site; and</p> <p>(e) detail the procedures for handling, storage, collection of recycling and disposal of waste."</p>	<p>Major Project portal acknowledgment of receipt of OEMP V3.0 on 9/02/2026</p> <p>Environmental Waste Log National Work Instruction Distribution 22/01/2026</p> <p>Environmental Waste Log for Kurnell (demonstration of SharePoint site)</p> <p>Environmental Waste Log Awareness Work Instruction completed by Operations Specialist (LMS record 5/09/2022)</p> <p>AECOM letter report dated 8/09/2023 providing waste classification of stockpiles from Tank 145 bunding area</p> <p>AECOM letter report dated 10/11/2025 providing waste classification of stockpiles from Tank 1, Zone 3 area</p>	<p>The WMP describes the management strategies for each identified waste type. It is supported by other Ampol procedures including the Environmental Waste Log National Work Instruction Distribution. Evidence of implementation of the WMP during the audit period includes:</p> <ul style="list-style-type: none"> Kurnell maintains a Waste Log on the Ampol SharePoint site. The Waste Log records the different waste types, their waste classification, quantity, transporter and disposal location. Files can be attached to each record including invoices, waste dockets and EPA Waste Tracking forms. The Waste Log was demonstrated to the auditors during the audit site inspection. Examples sighted included asbestos contaminated soils material transported by HiQ to its Cecil Park facility on 19/01/2026. HiQ Cecil Park is licenced to accept asbestos waste (EPA Licence no. 5186). The completed EPA online Waste Tracking Forms were observed to be attached to the entry. Where soil is excavated (for example as part of remediation projects) waste classification is conducted by environmental consultants. Sighted examples of waste classification reports provided by AECOM for stockpiles containing material excavated within the Tank 145 area and the Tank 1, Zone 3 area. These records were being maintained by the Remediation Manager. An opportunity for improvement exists to attach the waste classification reports to the corresponding Waste Log entry. The following waste streams were being recycled: empty drums, pallets and scrap metal. Cardboard, paper and comingled plastic waste was not being recycled as Ampol reported that quantities are too small for collection. Biosecurity waste bins were observed at the Wharf for ship waste designated as biosecurity waste. 	<p>from remediation projects) attach the waste classification reports to the corresponding entry in the Waste Log</p> <p>2026 IEA OFI 18 Investigate opportunities for recycling of cardboard, paper and comingled waste</p> <p>Refer 2026 IEA OFI 09</p>
	Demolition Waste and Resource Management Plan			
C40A	<p>The Applicant shall prepare and implement a Demolition Waste and Resource Management Plan for the demolition works to the satisfaction of the Secretary. This plan is to update the plan approved under condition C40 and shall also:</p> <p>(a) be prepared in consultation with the EPA;</p> <p>(b) be approved by the Secretary (refer to condition D1a for timing);</p> <p>(c) outline the measures for the removal, storage and disposal of all waste materials generated during the demolition works; and</p>	<p>2021 IEA Report, Lloyd's Register LRQA, August 2021 V3</p>	<p>Demolition works completed outside audit period. Assessed as compliant in 2021 IEA.</p>	<p>Complete</p>

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	(d) outline the waste reuse and recovery strategy for the demolition works.			
	Waste Received from Off-Site			
C41	The Applicant shall not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997, if such a licence is required in relation to that waste.*	EPL 837	EPL 837 allows for the receipt of some waste at the premises. Refer to assessment of compliance with conditions L4.1- L4.5 of the EPL.	Compliant
C41A	The Applicant shall ensure that the removal of the cooling water outlet pipeline 20 metres seaward from the low tide mark in Botany Bay is carried out in a manner that minimises the potential for disturbance and/or spread of <i>Caulerpa taxifolia</i> .	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Cooling water pipeline was removed outside audit period. Assessed as compliant in 2021 IEA.	Complete
	BIODIVERSITY & ECOLOGY			
	Biodiversity Management Plan			
C42	The Applicant shall prepare and implement a Biodiversity Management Plan for the development to the satisfaction of the Secretary. This plan must: <ul style="list-style-type: none"> (a) be prepared in consultation with the EPA; (b) be approved by the Secretary (refer to Conditions D1 and D2 for timing);; (c) include measures to be taken to minimise impacts on flora and fauna; (d) include a program with timeframes for implementation of the relevant recommendations contained in the Ecology Impact Assessment in Appendix I of the EIS, and the Management and Mitigation Measures contained in Chapter 19 of the EIS to minimise impacts on flora and fauna and maintain the biodiversity value of the site and surrounding environment. 	OEMP V2.0 10/09/2021 Appendix J BWPMP DPHI letter dated 08/04/2021 approving OEMP and sub plans OEMP V3.0 9/02/2026 Appendix J BWPMP Major Project portal acknowledgment of receipt of OEMP V3.0 on 9/02/2026 SWMS 2527 Tank 1 Zone 1 Phase 2 ACM Remediation, Manns Earthmoving Co 19/02/2026, Rev 2 Toolijooa Environmental Restoration Weed Management Plan Quote for Ampol Kurnell bushlands and wetlands, 2/02/2026 Email to NPWS re Eastern Osprey nest at Kurnell Wharf	A Biodiversity, Weed and Pest Management Sub Plan (BWPMP) has been prepared and forms an appendix to the OEMP. The OEMP (V2.0 03/03/2021) and associated sub plans was approved by DPHI by letter dated 8/04/2021. The letter noted the review included the Biodiversity, Weed and Pest Management Sub Plan required by Condition C42. A revised OEMP (V3.0 9/02/2026) was submitted to DPHI via the Major Projects portal on 9/02/2026. The BWPMP includes measures to minimise impacts on flora and fauna. Evidence of implementation of the BWPMP during the audit period includes: <ul style="list-style-type: none"> • Contractors undertaking excavation activities are required to check excavations daily for endangered fauna before commencing work (e.g. frogs and birds) and report to the Ampol Project Officer. This requirement was reflected in the SWMS provided by Manns Earthmoving for excavation works associated with ACM remediation in the vicinity of Tank 1. The SWMS also included the requirement to restrict stockpiles to cleared areas so as to not impact any vegetation. • Specialist consultants, Toolijooa Environmental Restoration (Toolijooa) have been engaged to target weeds in the wetland and bushland areas of the site to minimise impacts to native fauna and flora. At the time of the site inspection, Toolijooa had begun the Ampol on-boarding process prior to commencing the work. 	Compliant Refer 2026 IEA OFI 10 , 2026 IEA OFI 11 and 2026 IEA OFI 12

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
			<ul style="list-style-type: none"> Ampol reported that an Osprey had built a nest on top of the lighting tower at the Kurnell Wharf in July 2025. Disturbance to the nest was avoided while the Osprey reared its chicks. Ampol consulted with NPWS in February 2026 and will engage a specialist to remove the nest outside of the breeding season. 	
	Pest, Vermin & Noxious Weed Management			
C43	<p>The Applicant shall:</p> <p>(a) implement suitable measures to manage pests, vermin and declared noxious weeds on site;</p> <p>(b) measures to be taken to prevent the spread of any identified noxious/exotic weeds off site; and</p> <p>(c) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in surrounding area.</p> <p><i>Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993.</i></p>	<p>SWMS 2527 Tank 1 Zone 1 Phase 2 ACM Remediation, Manns Earthmoving Co 19/02/2026, Rev 2</p> <p>Toolijooa Environmental Restoration Weed Management Plan Quote for Ampol Kurnell bushlands and wetlands, 2/02/2026</p> <p>Swan Lake Weed Management Monthly Procedure 29/08/2024</p>	<p>Measures to manage pests, vermin and noxious weeds are included in the BWPMP.</p> <p>Evidence of implementation of the BWPMP during the audit period includes:</p> <ul style="list-style-type: none"> As stated under C42 Toolijooa has been engaged to undertake weed management across the bushland and wetland areas of the site. Toolijooa will target the Priority Weed species identified by SSC and identified <i>Ludwigia peruviana</i> as the predominant invasive species. The Weed Management Plan quote provided to Ampol included in the scope of work, two rounds of primary treatment (February and March 2026, monthly monitoring and secondary treatment (March to December 2026). General weed management across the remainder of the site (not including bushland and wetland areas) was undertaken by contractors, Elite Landscaping. This was reported to be done on an add needs basis under Ampol's Permit to Work process. Weed management in the Swan Lake Channel at the southern area of the site is undertaken under monthly through the M7 process. Ampol reported that rat baits are installed at the site by the Maintenance Team to control rat numbers. Rabbits are reportedly managed by Sutherland Shire Council across the Kurnell area. Ampol has a designated truck washdown area. This is used by excavation contractors during remediation project work. The SWMS provided by Manns Earthmoving for excavation works associated with ACM remediation in the vicinity of Tank 1, included the requirement that plant / vehicles must be cleaned before leaving the work site. 	Compliant
C43A	<p>The Applicant shall update and implement the Biodiversity and Weed Management Plan for the demolition works to the satisfaction of the Secretary. This plan is to consolidate the plans approved under conditions C42 and C43 and shall also:</p> <p>(a) be prepared in consultation with the OEH;</p> <p>(b) be approved by the Secretary (Refer to condition D1A for timing); and NSW Government 9 Department of Planning and Environment</p>	<p>2021 IEA Report, Lloyd's Register LRQA, August 2021 V3</p>	<p>Demolition works completed outside audit period. Assessed as compliant in 2021 IEA.</p>	Complete

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	(c) include details of pre-clearing inspections and frog exclusion measures to be undertaken prior to excavation along the Continental Carbon Pipeway Right of Way.			
	Continental Carbon Pipeline			
C43B	Within three months after the removal of the Continental Carbon Pipeline, the Applicant shall prepare a strategy, in consultation with the OEH, for the active management of the former pipeline route including a program for weed management and removal as outlined in Management and Mitigation Measure K6 in Appendix C of this consent. The Applicant shall have commenced implementation of this strategy six months after the removal of the Continental Carbon Pipeline.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3 Interviews with site personnel	The Continental Carbon Pipeline was removed in 2017 and assessed during previous IEAs. Ampol reported that the corridor is not actively managed for weeds.	Complete
	Cooling Water Outlet Management Plan			
C43C	The Applicant shall prepare and implement a Cooling Water Outlet Management Plan for the demolition works. The plan must: (a) be prepared in consultation with Council; (b) be approved by the Secretary (see condition D1A for timing); (c) include details of the timing and excavation program for pipeline removal, demolition methods, details of stockpiling, removal or reuse of excavated materials and the use of imported soils; (d) include details of the odour suppression measures during the pipeline removal works; and	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Demolition works completed outside audit period. Assessed as compliant in 2021 IEA.	Complete
	Protection of Marton Park Wetlands			
C44	To ensure that the measures implemented to protect Marton Park Wetland from sedimentation, erosion and possible contaminants related to the stormwater drainage upgrade works approved by Sutherland Shire Council (DA 13/0195) are successful, monitoring of Marton park Wetland must be undertaken after completion of the stormwater upgrade works, until otherwise agreed with Council, to ensure there are no detrimental impacts on the wetland. Caltex is to prepare a monitoring plan and submit it to Council for approval prior to completion of stormwater drainage upgrade works.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Stormwater upgrade works completed outside of audit period. Assessed in previous IEAs. DA 13/0195 has been surrendered.	Complete
	VISUAL			
	Lighting			

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
C45	The Applicant shall ensure that the lighting associated with the development: (a) complies with the latest version of AS 4282(INT) – <i>Control of Obtrusive Effects of Outdoor Lighting</i> ; and (b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3 Interviews with site personnel Community Contact log Register 2023-2025 Cumulative Environmental Incidents (complaints) 2021 Cumulative Environmental Incidents (complaints) 2022	The lighting associated with the development was installed outside audit period and assessed in previous IEAs. Ampol reported that no new lighting was installed during audit period, other than replacing existing lamps with LED lamps. One complaint was received from a resident relating to light from one of the tanks shining into their window. In response Ampol conducted an onsite assessment, met with the resident and identified the responsible light source and directed it downwards to mitigate offsite impacts.	Compliant
	Signage and Fencing			
C46	The Applicant shall not install any advertising on site without the written approval of the Secretary.	Site observations	No advertising was observed during the audit site inspection.	Compliant
	SITE SECURITY			
	Site Security			
C47	The Applicant shall ensure that: (a) site fencing and security gates are installed to the satisfaction of the Secretary; and (b) the security gates on site are locked whenever the site is unattended.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3 MHF Licence 20-6-96 (granted 14/10/2025) Site observations	Fencing and security gates were installed outside of audit period and assessed in previous IEAs. The MHF Licence granted on 14/10/2025 was subject to conditions which require the installation of additional security measures. This includes an additional 1.4 km security fence to be installed at the end of the fuel tank area and the vacant land & perimeter fence along the southern boundary. This was required to be completed by 28/02/2026. This was observed to have been recently installed at the time of the audit site inspection (16/02/2026). The MHF Licence conditions also require a CCTV upgrade project, with Stage 1 requiring completion by 28/02/2026. Stage 1 involves the installation of nine additional CCTV security cameras that are enabled for night vision and motion detection. These were yet to be installed at the time of the audit site inspection. The site is attended 24 hours / day, seven days a week.	Compliant
	ACS MANAGEMENT WORKS			
	Site Auditor			
C48	Prior to commencement of the ACS management works, the Applicant shall provide evidence that an EPA accredited Site Auditor has been appointed to review and approve the RAP and long-term environmental management plan (LTEMP) (see Conditions C54 and C55, respectively).	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	ACS management works completed outside audit period. Assessed as compliant in 2021 IEA.	Complete
	Remedial Action Plan			
C49	Prior to commencement of the ACS management works, the Applicant shall ensure the RAP is reviewed and approved by the Site Auditor. The Site Auditor shall be satisfied the design	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	ACS management works completed outside audit period. Assessed as compliant in 2021 IEA.	Complete

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	<p>and construction methods outlined in the CQAP will achieve a level of containment which meets the remedial objectives described in the RAP.</p> <p>A copy of the Site Audit Report, Site Audit Statement shall be provided to the EPA and Secretary, which demonstrates the appropriateness of the RAP.</p> <p>Note: The Site Auditor should consider the Construction Quality Assurance Procedures in relation to the Environmental Guidelines: Solid Waste Landfills (EPA, 2nd Edition, 2016)</p>			
	Containment Cell			
C50	<p>Prior to commencement of the ACS management works, the Applicant shall prepare a Containment Cell Management Plan (CCMP) for the ACS management works. The plan shall be prepared in accordance with Condition D3 and shall:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s), in consultation with the EPA; (b) be approved by the Secretary; (c) describe details of the cell construction and filling activities including soil acceptance criteria for the containment cell; (d) describe the measures that will be implemented to ensure the control of soil, surface water, groundwater, air quality and noise impacts associated with the ACS management works; (e) include a register to detail the type and volume of material excavated and disposed of as part of the ACS management works; and <p>include details of dust, asbestos, waste and groundwater monitoring requirements.</p>	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	ACS management works completed outside audit period. Assessed as compliant in 2021 IEA.	Complete
C51	The Applicant shall only place ACS sourced from within the site in the containment cell.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	ACS management works completed outside audit period. Assessed as compliant in 2021 IEA.	Complete
C52	<p>Upon completion of the construction aspects associated with the ACS management works (which includes closure of the containment cell), the Applicant shall prepare a Containment Cell Final Report. The report shall:</p> <ul style="list-style-type: none"> (a) be submitted to the EPA; (b) confirm the containment cell has been constructed in accordance with the CQAP; and 	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	ACS management works completed outside audit period. Assessed as compliant in 2021 IEA.	Complete

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	include a summary of the waste classification data (including characterisation and tracking) and monitoring data required under Condition C50 (e) and (f).			
	Long Term Environmental Management Plan			
C53	Prior to the completion of the construction aspects associated with the ACS management works, the Applicant in consultation with the EPA, shall prepare a LTEMP for the containment cell, to the satisfaction of the Site Auditor. A copy of the Site Audit Report and Site Audit Statement shall be provided to the EPA and Secretary, which demonstrates the appropriateness of the LTEMP	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	ACS management works completed outside audit period. Assessed as compliant in 2021 IEA.	Complete
C54	Upon completion of the construction aspects associated with the ACS management works (which includes closure of the containment cell) closure of the containment cell, the Applicant shall: (a) implement the approved LTEMP and manage the containment cell in accordance with the approved LTEMP; and (b) ensure the containment cell is listed on the relevant planning certificate for the land, issued under Section 149(5) of the EP&A Act, for the site.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3 ACM LTEMP V1.0 15/01/2026 Site observations M7 #70159379 ACM Containment Cell vegetation and erosion monitoring M7 # 70159239 ACM Containment Cell leachate equipment inspection	a) The Asbestos Contaminated Soil (ACM) Containment Cell Long Term Environmental Management Plan (LTEMP) is included as an appendix to the OEMP. The LTEMP was revised on 15/01/2026. The ACM containment cell was viewed during the audit site inspection and observed to be grassed and undisturbed. Ampol demonstrated its M7 maintenance system and the auditors sighted the following evidence of inspections and maintenance relating to the ACM containment cell: <ul style="list-style-type: none">Six monthly vegetation and erosion monitoring to identify and remove vegetation that could impact the capping layer. The last inspection was completed by contractors, Elite Landscaping on 20/11/2025.Six monthly leachate mechanical equipment inspection to check condition of leachate pumps, sumps and air supply piping. The last inspection was completed by contractors, Marley Flow on 12/11/2025. No issues requiring rectification were identified. b) assessed as compliant in 2021 IEA	Compliant
	Pipeway Validation			
C55	Upon completion of the construction aspects associated with the ACS management works, the Applicant shall prepare a Validation Report of the pipeways. The report shall: (a) be submitted to the EPA and the Secretary for review; (b) be prepared in accordance with the RAP and the <i>Contaminated Sites: Guidelines for Consultants Reporting on Contaminated Sites</i> (OEH 2011); (c) include details of the following: (i) sampling and analysis plan and sampling methodology; and (ii) results of any validation sampling compared to relevant guidelines/criteria.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Validation Report completed outside of audit period. Assessed as compliant in 2021 IEA.	Complete

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	SCHEDULE D ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING			
	ENVIRONMENTAL MANAGEMENT			
	Construction Environmental Management Plan			
D1	<p>The Applicant shall prepare and implement a <u>Construction Environmental Management Plan</u> for the Development to the satisfaction of the Secretary. The Plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with Sutherland Shire Council and the EPA; (b) be submitted to the Secretary for approval no later than four (4) weeks prior to the commencement of construction or demolition, or within such period otherwise agreed by the Secretary; (c) identify the statutory Consents that apply to the Development; (d) consolidate all relevant management plans and monitoring programs required in the conditions of this Consent; (e) outline all environmental management practices and procedures to be followed during construction and demolition works associated with the Development; (f) describe all activities to be undertaken on the site during construction of the Development, including a clear indication of construction stages; (g) incorporate all relevant management and mitigation measures contained in the EIS and RTS; (h) detail how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts. In particular, the following environmental performance issues shall be addressed in the Plan: <ul style="list-style-type: none"> (i) Human Health and Ecological Risk management - which shall be mitigated and managed in accordance with Section 6.2 of the "Human Health and Ecological Qualitative Risk Assessment" report prepared by URS, dated 28 February 2013 and the relevant Management and Mitigation Measures contained in Appendix C of this consent; (ii) Biodiversity and Weed management; (iii) Soils and Erosion management; (iv) Contamination management; 	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Construction works completed outside audit period. Assessed in previous IEAs.	Complete

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	<p>(v) Noise and Vibration management;</p> <p>vi) Air Quality management;</p> <p>(vii) Stormwater and Wastewater management;</p> <p>(viii) Traffic management;</p> <p>(ix) Heritage management (Aboriginal and non-Aboriginal);</p> <p>(x) Waste and Resource management;</p> <p>(xi) Groundwater management;</p> <p>(xii) Acid Sulfate Soils management – if required;</p> <p>(xiii) Emergency (including spill) management;</p> <p>(xiv) means for assessing (and where identified) for managing interactions and cumulative impacts from the concurrent construction of other development works in the area should these coincide with the Development (e.g. the Caltex Ports and Berthing upgrade, remediation projects);</p> <p>(i) describe the roles and responsibilities for all relevant employees involved in construction and demolition works associated with the Development;</p> <p>(j) include arrangements for community consultation, including consultation with the NSW Department of Education and local schools at key stages of the development that may affect school operations, to identify issues and mitigate impacts throughout the course of the Development.</p> <p>(k) Include a complaints handling procedure during construction and demolition and operation; and,</p> <p>(l) include appropriate procedures to allow the regular review of the requirements of each plan to ensure that they are effective and allow for adaptive management to address contingencies that may arise over the life of the development.</p> <p>The approval of a Construction Environmental Management Plan does not relieve the Applicant of any requirement associated with this development consent. If there is an inconsistency with an approved Construction Environmental Management Plan and the conditions of this development consent, the requirements of this development consent prevail</p> <p>Construction of the development shall not commence until written consent of this plan has been received from the Secretary.</p>			
	Demolition Environmental Management Plan			

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
D1A	<p>The Applicant shall prepare and implement a <u>Demolition Environmental Management Plan</u> for the demolition works to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with Council, EPA and NSW Health; (b) be submitted to the Secretary for approval no later than four (4) weeks prior to the commencement of the demolition works, or within such period otherwise agreed by the Secretary; (c) identify the statutory approvals and consents that apply to the development; NSW Government 10 Department of Planning and Environment (d) consolidate all relevant management plans and monitoring programs required in the conditions of this Consent; (e) outline all environmental management practices and procedures to be followed during demolition works associated with the development; (f) describe all activities to be undertaken on the site during demolition works associated with the development, including a clear indication of demolition stages; (g) incorporate all relevant management and mitigation measures contained in the SEE; (h) detail how the environmental performance of the demolition works will be monitored, and what actions will be taken to address potentially adverse environmental impacts. In particular, the following environmental performance issues shall be addressed in the Plan: <ul style="list-style-type: none"> i. Biodiversity and weed management(See Condition C43A); ii. Soils and water management (See Condition C12A); iii. Contamination management (See Condition C15A); iv. Noise and vibration management (See Condition C22A); v. Air quality management (See Condition C28A); vi. Stormwater and wastewater management (See Condition C12A); vii. Traffic management (See Condition C36A); viii. Demolition waste and resource management (See Condition C40A); ix. Groundwater management, including measures which are consistent with the relevant Management and Mitigation Measures contained in Appendix C of this consent; 	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	Demolition works completed outside audit period. Assessed as compliant in 2021 IEA.	Complete

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	<p>x. Acid sulphate soils management (See Condition C14);</p> <p>xi. Heritage management strategy (See Condition C31);</p> <p>xii. Cooling water outlet management (see Condition C42B);</p> <p>xiii. pipeline removal works on Kurnell Wharf, including details of the timing and program of works, demolition and removal techniques, and the measures to manage traffic and access to the wharf.</p> <p>xiv. means for assessing (and where identified) for managing interactions and cumulative impacts from the concurrent construction of other development works within the site should these coincide with the Development (e.g. the Caltex Ports and Berthing upgrade, remediation projects).</p> <p>(i) describe the roles and responsibilities for all relevant employees involved in the demolition works associated with the Development;</p> <p>(j) include details of a community notification protocol to notify potentially affected persons (including the local community and surrounding industries) of works which are likely to cause significant adverse impacts to the environment;</p> <p>(k) include a complaints handling procedure; and</p> <p>(l) include appropriate procedures to allow the regular review of the requirements of each plan to ensure that they are effective and allow for adaptive management to address issues that may arise over the life of the development.</p> <p>The approval of a <u>Demolition Environmental Management Plan</u> does not relieve the Applicant of any requirement associated with this development consent. If there is an inconsistency with an approved Demolition Environmental Management Plan and the conditions of this development consent, the requirements of this development consent prevail.</p> <p>Demolition works shall not commence until written approval of this plan has been received from the Secretary.</p>			
	Operational Environmental Management Plan			
D2	<p>The Applicant shall prepare and implement an <u>Operational Environmental Management Plan</u> for the project to the satisfaction of the Secretary. This Plan must:</p> <p>(a) be approved by the Secretary prior to the completion of the Development;</p> <p>(b) provide the strategic framework for environmental management of the project;</p>	<p>OEMP V2.0 10/09/2021</p> <p>DPHI letter dated 08/04/2021 approving OEMP and sub plans</p> <p>OEMP V3.0 9/02/2026</p> <p>Interviews with site personnel</p>	<p>The OEMP (V2.0 03/03/2021) and associated sub plans was approved by DPHI by letter dated 8/04/2021.</p> <p>A revised OEMP (V3.0 9/02/2026) was submitted to DPHI via the Major Projects portal on 9/02/2026. At the time of writing DPHI was yet to approve the revised plan.</p>	<p>Compliant</p> <p>Refer 2026 IEA OFI 01, 2026 IEA and OFI 02 and</p>

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	<p>(c) identify the statutory approvals that apply to the project;</p> <p>(d) include a copy of all relevant management plans and monitoring programs relevant under this consent;</p> <p>(e) outline all environmental management practices and procedures to be followed during operation;</p> <p>(f) describe all activities to be undertaken on the site during operation;</p> <p>(g) detail how the environmental performance of the operation of the project will be monitored, and what actions will be taken to address identified adverse environmental impacts;</p> <p>(h) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;</p> <p>(i) describe the procedures that will be implemented to:</p> <ul style="list-style-type: none"> · keep the local community and relevant agencies informed about the operation and environmental performance of the project; · receive, handle, respond to, and record complaints; · resolve any disputes that may arise during the course of the project; · respond to any non-compliance; and · respond to emergencies; and; <p>(j) include:</p> <ul style="list-style-type: none"> · copies of any strategies, plans and programs approved under the conditions of this consent; and <p>a clear plan depicting all the monitoring required to be carried out under the conditions of this consent.</p>	<p>Major Project portal acknowledgment of receipt of OEMP V3.0 on 9/02/2026</p> <p>Environmental Awareness module (Part 1 & 2)</p> <p>Demonstration of LMS (sighted evidence of completion of Environmental Awareness Part 1 & 2 by Operations Specialist and Operations Coordinator)</p> <p>Community Contact log Register 2023-2025</p> <p>Cumulative Environmental Incidents (complaints) 2021</p> <p>Cumulative Environmental Incidents (complaints) 2022</p> <p>Demonstration of SAP M7/M8 program</p> <p>2025 OHSE Internal Audit Plan 8/10/2024</p> <p>2026 OHSE Internal Audit Plan 10/11/2025</p> <p>Cintellate Meeting Record 2021</p> <p>IEA Follow up Actions</p>	<p>The OEMP addresses the requirements of this condition. Refer also to this IEA report Section 3.2 for review of adequacy of environmental management plans.</p> <p>Evidence of implementation of the OEMP during the audit period includes:</p> <ul style="list-style-type: none"> • The LMS was being used to track currency and completion of training requirements. Environmental awareness training was provided to Ampol operations personnel. • Community complaints were recorded as near loss incidents within LPS. Complaints were investigated and complainants responded to by the Community Engagement Manager. • Environmental monitoring as required by the EPL was being undertaken and results were summarised on the Ampol website. • Preventative maintenance was implemented through the SAP (M7/M8) program. • Audits were being undertaken (e.g. Internal OHSE audits, ISO14001 surveillance audits and independent IEAs). Actions from audits were being tracked in Cintellate. • Records were being maintained in the LPS Database (incidents and complaints), Cintellate (audit reports), LMS (training records). • Reporting requirements including provision of Annual Reviews to DPHI, Annual Returns to the EPA and incident reporting were being met. • The OEMP was being reviewed at a minimum every 5 years. 	
D3	<p>The Applicant shall ensure that the <u>Management Plans</u> required under this consent are prepared in accordance with any relevant guidelines, and include:</p> <p>(a) detailed baseline data;</p> <p>(b) a description of:</p> <p>(c) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</p> <ul style="list-style-type: none"> · any relevant limits or performance measures/criteria; and · the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; <p>(d) a description of the measures that will be implemented to comply with the relevant statutory</p>	<p>OEMP V2.0 10/09/2021</p> <p>DPHI letter dated 08/04/2021 approving OEMP and sub plans</p> <p>OEMP V3.0 9/02/2026</p> <p>Major Project portal acknowledgment of receipt of OEMP V3.0 on 9/02/2026</p>	<p>Management plans have been prepared to address these requirements and have been approved by DPHI.</p> <p>Refer also to this IEA report Section 3.2 for review of adequacy of environmental management plans.</p>	Compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	<p>requirements, limits, or performance measures/criteria;</p> <p>(e) a program to monitor and report on the:</p> <ul style="list-style-type: none"> · impacts and environmental performance of the development; and · effectiveness of any management measures (see (c) above); <p>(f) a contingency plan to manage any unpredicted impacts and their consequences;</p> <p>(g) a program to investigate and implement ways to improve the environmental performance of the development over time;</p> <p>(h) a protocol for managing and reporting any:</p> <ul style="list-style-type: none"> · incidents; · complaints; · non-compliances with statutory requirements; and · exceedances of the impact assessment criteria and/or performance criteria; and <p>(i) a protocol for periodic review of the plan.</p> <p><i>Note: The Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.</i></p>			
	Annual Review			
D4	<p>By 31 December 2014, or as otherwise agreed in writing by the Secretary, the Applicant shall review the environmental performance of the Development to the satisfaction of the Secretary. This review must:</p> <p>(a) describe the development that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year;</p> <p>(b) include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, which includes a comparison of these results against:</p> <ul style="list-style-type: none"> · the relevant statutory requirements, limits or performance measures/criteria; · the monitoring results of previous years; and · the relevant predictions in the EIS; <p>(c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;</p> <p>(d) identify any trends in the monitoring data over the life of the Development;</p>	<p>Annual Reviews for 2021 - 2025</p> <p>DPHI letter dated 14/06/23 accepting amended 2021 Annual Review</p> <p>DPHI letter dated 16/11/2023 accepting 2022 Annual Review</p> <p>DPHI letter dated 08/03/2024 accepting 2023 Annual Review</p> <p>DPHI letter dated 09/01/2025 accepting 2024 Annual Review</p>	<p>Annual Reviews have been prepared for the audit period (2021 – 2025) and were available on the Ampol website.</p> <p>DPHI issued a request for additional information relating to the 2021 Annual Review. The 2021 Annual Review was amended and resubmitted to DPHI and approved by letter dated 14/06/2023.</p> <p>The 2022 Annual Review was accepted by DPHI by letter dated 16/11/2023.</p> <p>The 2023 Annual Review was accepted by DPHI by letter dated 8/03/2024.</p> <p>The 2024 Annual Review was accepted by DPHI by letter dated 9/01/2025.</p> <p>The 2025 Annual Review was submitted to DPHI via the Major Projects Portal on 23/12/2025.</p> <p>The 2025 Annual Review was reviewed by the auditor and considered to address the requirements of this condition. Table 2A in Section 2.3 Environmental Monitoring Performance is missing the EPL limits for some of the pollutants.</p>	<p>Compliant</p> <p>2026 IEA OFI 20</p> <p>For future Annual Reviews, update Table 2A, Section 2.3 Environmental Monitoring Performance to include the EPL limits for all pollutants.</p>

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	(e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the current calendar year to improve the environmental performance of the Development.			
D5	<p>Within three months of:</p> <p>(a) an approval of a modification; (b) a submission of an incident report under Condition D6; (c) an approval of an Annual Review under Condition D4; or (d) a completion of an audit under Condition D7</p> <p>the Applicant shall review, and if necessary, revise the strategies, plans, and programs required under this consent to the satisfaction of the Planning Secretary.</p> <p>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</p>	Interviews with site personnel	<p>Section 7.7 of the OEMP sets out the requirements for review of the OEMP and also references Section 4.4 (note should be 4.3, Review and Update of Environmental Risk Register). These two sections include triggers for OEMP reviews including changes to operational and/ or environmental controls, major changes in legislative requirements, audit report outcomes and incident, significant near miss and non-conformance investigation reports or if not triggered by the above, every five years. Whilst some of the triggers for OEMP review in Condition D5 are captured in the OEMP, the OEMP does not specifically address the requirement of Condition D5 that plans and programs are reviewed following the Annual Review.</p> <p>The OEMP was revised in 2020 and 2026. Ampol reported that following the significant incident in April 2022, a number of upgrades were agreed with the EPA that took time to implement. Following completion of the works in 2024, the OEMP was reviewed in 2025 and completed in 2026. It is acknowledged that the OEMP is a large and comprehensive document and that reviews of the OEMP and attached sub-plans take considerable time. However, it is considered that to comply with this requirement, Ampol are required to review the OEMP and sub plans if the triggers outlined in Condition D5 are met, which includes annually following approval of the Annual Review.</p>	<p>Non-compliant</p> <p>2026 IEA REC 01 Update Section 7.7 of the OEMP to specifically address the requirements of Development Consent Condition D5 for review of management plans and programs; and implement.</p>
	REPORTING			
	Incident Reporting			
D6	The Applicant shall notify the Secretary and any other relevant agencies of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment associated with the development as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of this incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident.	<p>Letter to DPHI dated 09/04/2022 re Incident Notification Flooding of Wastewater Treatment Plan at Ampol Kurnell</p> <p>DPHI acknowledgement of receipt of incident notification dated 11/04/2022</p> <p>Enforceable Undertaking 30/08/2023</p> <p>Show Cause Letter issued by EPA 06/05/2024 re pipeline rupture incident</p>	<p>There were five incidents which occurred during the audit period that were notified to the EPA as causing or threatening material harm to the environment. The Ampol PIRMP, and <i>Guideline - Pollution Incident Response Management Plans (EPA, 2022)</i> does not include a requirement to notify DPHI.</p> <p>Ampol assessed that of the 5 incidents that were notified to the EPA, only the following incident triggered notification to DPHI:</p> <ul style="list-style-type: none"> • WWTP overflow incident on 7 April 2022 following heavy rainfall. The incident resulted in hydrocarbon-impacted floodwaters overflowing from the WWTP and the site into the surrounding environment and residential areas of Kurnell. The incident was reported to DPHI by letter dated 9 April 2022 via the Major Projects Portal. DPHI responded that the 'Department has no comments on 	<p>Non-compliant</p> <p>2026 IEA REC 02 Notify DPHI as soon as practicable after an incident with the potential to cause significant off-site impacts on people or the biophysical environment, and follow up with an incident report.</p>

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
		<p>Official Caution issued by EPA 16/07/2024 re pipeline rupture incident</p> <p>Email from EPA 11/07/2025 re shipping noise complaints</p> <p>Advisory Letter issued by EPA 17/07/2025 re shipping noise impacts</p> <p>Ampol response to Advisory Letter re shipping noise impacts 06/08/2025</p> <p>Email to EPA 27/09/2025 notifying of complaints relating to ship emitting black smoke and advising EPA Environment Line was called.</p> <p>Email from EPA 29/09/2025 requesting further details of incident in form of R3 incident report</p> <p>Email to EPA providing R3 Incident Report 1/10/2025</p> <p>Email from EPA 6/12/2024 requesting further information on reported oil sheen from ship berthed at Kurnell Wharf</p> <p>Letter to EPA 10/12/2024 providing information requested re POLAR BRIGHT sheen incident</p>	<p>the document at this time' which Ampol interpreted as not requiring to provide an incident report.</p> <p>Ampol assessed that the other four incidents that were notified to the EPA, did not trigger notification to DPHI, i.e:</p> <ul style="list-style-type: none"> A pipeline rupture on 22 March 2024 caused the release of up to 5,500 L of gasoline. The gasoline did not escape from the premises and was captured on site and directed to the WWTP. This incident resulted in a Show Cause letter and Official Caution being issued by the EPA, however as the incident did not cause off-site impacts, it was not reported to DPHI. A number of odour complaints were received by Ampol and the EPA. Although gasoline did not escape from the premises, the loss of containment of gasoline on-site had potential to cause off-site impacts to the environment and people. A significant number of noise complaints were received over the period 6-13 July 2025 relating to the two sister ships the HAFNIA LARVIK and HAFNIA LILLESAND berthed at the Kurnell Wharf. This issue was discussed with the EPA and an Advisory Letter issued by the EPA dated 17/07/2027. Follow up actions were managed through Special Conditions included on the EPL (refer EPL Condition E4). Ampol reported that in 2022 DPHI confirmed that exceedances of noise limits are not considered notifiable incidents under Condition D6. On this basis, Ampol did not notify DPHI of the complaints received relating to the noise from these ships. A ship berthed at Kurnell Wharf emitted black smoke on 27 September 2025. This was reported to the EPA and an incident report provided. No further requests / actions were taken by the EPA. A number of complaints were received by Ampol and the EPA regarding the smoke. A ship berthed at Kurnell Wharf (POLAR BRIGHT) released an oily sheen into the water on 5 December 2024. This was reported to the EPA and an incident report provided. No further requests / actions were taken by the EPA.. <p>As the April 2022 WWTP overflow event was not reported to DPHI as soon as practicable after becoming aware of the incident and an incident report was not provided to DPHI, this condition has been assessed as non-compliant.</p> <p>There is an opportunity for improvement for Ampol to consider reporting incidents that trigger reporting under the PIRMP to also be reported to DPHI.</p>	<p>2026 IEA OFI 20</p> <p>Consider reporting incidents that trigger reporting under the PIRMP, to also be reported to DPHI.</p>

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	INDEPENDENT ENVIRONMENTAL AUDIT			
D7	<p>Within a year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:</p> <p>(a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</p> <p>(b) include consultation with the relevant agencies;</p> <p>(c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL and/or Water License (including any assessment, plan or program required under these approvals);</p> <p>(d) review the adequacy of any approved strategy, plan or program required under these approvals; and</p> <p>(e) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.</p> <p><i>Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary.</i></p>	<p>2021 IEA Report, Lloyd's Register LRQA, August 2021 V3</p> <p>Acknowledgment of receipt dated 29/04/2021 from Major Projects Portal submitting 2021 IEA</p> <p>Email from DPHI 20/08/2021 providing comments on 2021 IEA</p> <p>Email from DPHI 31/08/2021 responding to amended 2021 IEA</p> <p>Ampol letter requesting 2024 IEA deferral submitted via Major Projects Portal 29/05/2024</p> <p>DPHI letter dated 27/06/2024 approving 2024 IEA deferral</p> <p>DPHI email dated 20/11/2025 notifying that technical breach of D8 due to timing of IEA</p>	<p>The third IEA was conducted in 2021 by an auditor from Lloyd's Register Quality Assurance Limited that was approved by DPHI.</p> <p>The 2021 IEA covered the audit period 2017 – 2021. DPHI approval was obtained to defer the audit from September 2020 to May 2021 due to operational restrictions arising from the COVID-19 pandemic. The 2021 IEA was submitted to DPHI via the Major Projects portal on 29/04/2021. Comments were received from DPHI and the IEA amended and resubmitted on 30/08/2021. Email correspondence was received from DPHI noting that the Department had finalised its review of the 2021 IEA and closed the matter out.</p> <p>The fourth IEA was due for completion in August 2024. Ampol requested that DPHI extend the IEA period from every three years to every four years. DPHI approved a one-off extension of the 2024 IEA to be completed by 30/08/2025. The original auditor that was approved by DPHI was unable to undertake the audit. DPHI was informed of this and an alternate auditor proposed who was not approved by DPHI. The current 2025 IEA audit team was approved by DPHI on 11/09/2025. DPHI was informed via email that the lead auditor would not be able to complete the audit in October as originally planned due to personal health issues. The audit was re-scheduled for the first quarter of 2026 with the audit site inspection taking place on 16/02/2026. DPHI notified Ampol by email dated 20/11/2025 that it considered this a breach of Condition D7.</p> <p>The auditor considers that Ampol commenced the process of planning and commissioning the 2024 IEA with sufficient time to meet the extended deadline and that the reasons for the delay were outside of Ampol's control. This condition has been assessed as non-compliant as the timing for the fourth IEA was not met however, no recommendations are made.</p> <p>The 2025 IEA addresses the requirements of this condition. Refer to this IEA report Section 1.2 Audit Scope for details of where each item is addressed.</p>	Non-compliant
D8	<p>Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.</p>	<p>Acknowledgment of receipt dated 29/04/2021 from Major Projects Portal submitting 2021 IEA</p> <p>Email from DPHI 31/08/2021 responding to amended 2021 IEA</p>	<p>Ampol's Response to Recommendations was included in the IEA (Table 7) and submitted via the Major Projects portal on 29/04/2021. The revised 2021 IEA was submitted via the Major Projects Portal on 30/08/2021.</p>	Compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	ACCESS TO INFORMATION			
D9	<p>The Applicant must, to the satisfaction of the Planning Secretary:</p> <p>(a) make the following information publicly available on its website:</p> <ul style="list-style-type: none"> • the EIS; • MOD 1 and its accompanying documents; • MOD 2 and its accompanying documents; • MOD 3 and its accompanying documents; • MOD 4 and its accompanying documents; • MOD 5 and its accompanying documents; • MOD 6 and its accompanying documents; • current statutory approvals for the Development; • approved strategies, plans or programs; • a summary of the monitoring results of the Development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent; • a complaints register, updated on a quarterly basis; • copies of any annual reviews (over the last 5 years); • any independent environmental audit, and the Applicant's response to the recommendations in any audit; and • any other matter required by the Planning Secretary; and <p>a) keep this information up-to-date,</p> <p>Note: This requirement does not require any confidential information to be made available to the public</p>	<p>https://www.ampol.com.au/sustainability/environment/kurnell-refinery-conversion-project (accessed 12/02/2026)</p> <p>https://www.ampol.com.au/sustainability/environment/environmental-monitoring-data-kurnell-terminal (accessed 12/02/2026)</p>	<p>The Ampol website (Refinery Conversion Project webpage) was accessed on 12/02/2026 and noted to include the following:</p> <ul style="list-style-type: none"> • EIS for the conversion and demolition. • Project Approval including modification approvals and accompanying documents (Statement of Environmental Effects, Response to Submissions Report). • Project Management Plans for the Conversion / Demolition. • ACS Long Term Environmental Management Plan. • OEMP. • Annual Reviews (2014 – 2024). The 2025 Annual Review was awaiting acceptance from DPHI before uploading to the website. • IEAs (2014, 2016-2017, 2017-2021) which include within them Ampol's response to recommendations. • Complaints summary (graph showing number of complaints received per year and by issue 2021-2025). <p>Monitoring data was included on the Kurnell Terminal Environmental Monitoring Data webpage as required by the Protection of the Environment Operations Act 1997 (POEO Act) for EPL 837. This includes groundwater quality and effluent quality monitoring.</p> <p>A summary of monitoring data is also presented within the Annual Reviews which are available on the website.</p>	Compliant

Table A2: Environment Protection Licence -837 Compliance Assessment

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations								
1 ADMINISTRATIVE CONDITIONS												
A1.1	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table border="1"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> </tr> </thead> <tbody> <tr> <td>Chemical storage</td> <td>On-site generated chemical waste storage</td> </tr> <tr> <td>Chemical storage</td> <td>Petroleum products storage</td> </tr> <tr> <td>Shipping in bulk</td> <td>Shipping in bulk</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Chemical storage	On-site generated chemical waste storage	Chemical storage	Petroleum products storage	Shipping in bulk	Shipping in bulk	Site observations	The activities undertaken on site during the audit period are aligned with those listed in this condition.	Compliant
Scheduled Activity	Fee Based Activity											
Chemical storage	On-site generated chemical waste storage											
Chemical storage	Petroleum products storage											
Shipping in bulk	Shipping in bulk											
A2.1	<p>The licence applies to the following premises:</p> <table border="1"> <thead> <tr> <th>Premises Details</th> </tr> </thead> <tbody> <tr> <td>AMPOL REFINERIES (NSW) PTY LTD</td> </tr> <tr> <td>2 SOLANDER STREET</td> </tr> <tr> <td>KURNELL</td> </tr> <tr> <td>NSW 2231</td> </tr> </tbody> </table> <p>(Refer to EPL for Lot & DPs)</p>	Premises Details	AMPOL REFINERIES (NSW) PTY LTD	2 SOLANDER STREET	KURNELL	NSW 2231		Noted.	Noted			
Premises Details												
AMPOL REFINERIES (NSW) PTY LTD												
2 SOLANDER STREET												
KURNELL												
NSW 2231												
A2.2	<p>The premises location is shown on the map below: (Refer to EPL for map)</p>		Noted.	Noted								
A3.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <p>a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p> <p>b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>		A review of the licence application and supporting information was not undertaken as part of this audit.	Not assessed								
2 DISCHARGES TO AIR AND WATER AND APPLICATIONS TO LAND												
P1.1	<p>The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.</p>		No utilisation areas are included in the licence.	Noted								

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations																												
P1.2	<p>The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point. (Summarised from EPL)</p> <table border="1"> <thead> <tr> <th>EPA No.</th> <th>Type of Monitoring Point</th> <th>Type of Discharge Point</th> <th>Location Description</th> </tr> </thead> <tbody> <tr> <td>2</td> <td></td> <td>Discharge to waters</td> <td>Submerged outfall at Point 2 (Note: Not at Point 1)</td> </tr> <tr> <td>15</td> <td>Groundwater quality monitoring</td> <td></td> <td>Bioremediation (landfill)</td> </tr> <tr> <td>16</td> <td>Groundwater quality monitoring</td> <td></td> <td>Bioremediation (landfill)</td> </tr> <tr> <td>27</td> <td>Effluent quality and volume monitoring</td> <td></td> <td>Sampling at wastewater treatment discharge point (2)</td> </tr> <tr> <td>28</td> <td>Groundwater quality monitoring</td> <td></td> <td>Asbestos Contamination Containment</td> </tr> <tr> <td>29</td> <td>Groundwater quality monitoring</td> <td></td> <td>Asbestos Contamination Containment</td> </tr> </tbody> </table>	EPA No.	Type of Monitoring Point	Type of Discharge Point	Location Description	2		Discharge to waters	Submerged outfall at Point 2 (Note: Not at Point 1)	15	Groundwater quality monitoring		Bioremediation (landfill)	16	Groundwater quality monitoring		Bioremediation (landfill)	27	Effluent quality and volume monitoring		Sampling at wastewater treatment discharge point (2)	28	Groundwater quality monitoring		Asbestos Contamination Containment	29	Groundwater quality monitoring		Asbestos Contamination Containment	Site observations	The monitoring / discharge points were observed during the audit site inspection (with the exception of Point 2, the submerged ocean outfall).	Compliant
EPA No.	Type of Monitoring Point	Type of Discharge Point	Location Description																													
2		Discharge to waters	Submerged outfall at Point 2 (Note: Not at Point 1)																													
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3 LIMIT CONDITIONS																																
L1 Pollution of waters																																
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997	Refer Development Consent Condition C10	Ampol reported it was non-compliant against this condition in its 2021-2022 Annual Return and its 2022 Annual Review based on an oily-water overflow incident that occurred on 7/04/2022 that impacted waterways, wetlands and surrounding land in Kurnell. Refer to Development Consent Condition C10 for further details; and this IEA report Section 3.1.2 for further discussion of incidents.	Non-compliant																												
L2 Load limits																																
L2.1	The actual load of an assessable pollutant discharged from the premises during the reporting period must not exceed the load limit specified for the assessable pollutant in the table below. Note: An assessable pollutant is a pollutant which affects the licence fee payable for the licence.	Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025	The assessable pollutants did not exceed the load limits specified in L2.2 as reported by Ampol in the Annual Returns for the audit period.	Compliant																												

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations								
L2.2	<p>The actual load of an assessable pollutant must be calculated in accordance with the relevant load calculation protocol.</p> <table border="1"> <thead> <tr> <th>Assessable Pollutant</th> <th>Load limit (kg)</th> </tr> </thead> <tbody> <tr> <td>Benzene (Air)</td> <td>6000.00</td> </tr> <tr> <td>Volatile organic compounds - Summer (Air)</td> <td></td> </tr> <tr> <td>Volatile organic compounds (Air)</td> <td>3000000.00</td> </tr> </tbody> </table>	Assessable Pollutant	Load limit (kg)	Benzene (Air)	6000.00	Volatile organic compounds - Summer (Air)		Volatile organic compounds (Air)	3000000.00	Interviews with site personnel	Ampol reported that the assessable pollutant calculations are undertaken by environmental consultants, Nicholson Environmental and provided to Ampol as a spreadsheet. The calculations were not reviewed by the auditor.	Compliant
Assessable Pollutant	Load limit (kg)											
Benzene (Air)	6000.00											
Volatile organic compounds - Summer (Air)												
Volatile organic compounds (Air)	3000000.00											
L3 Concentration Limits												
L3.1	For each monitoring/discharge point or utilisation area specified in the table/s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.		Refer to L3.4 for discussion.	Refer to L3.4								
L3.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.		Noted.	Noted								
L3.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table/s.		Noted.	Noted								
L3.4	<p>Water and/or Land Concentration Limits (Refer to EPL for table of limits)</p> <p>Note: The pH limit specified for Point 2 is based on a 6 minute rolling average.</p>	Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025 Annual Reviews 2021 - 2025	A review of the EPA Annual Returns and the Annual Reviews did not identify exceedances of the limits specified in the EPL for discharges to water at the licensed discharge point.	Compliant								
L3.5	For the purposes of Condition L3.4, for periods when the biotreater wastewater treatment plant is under bypass conditions as specified in Condition O6.3 of this licence, only the concentration limits for pH and Temperature and those which include the term "Wet" applies for discharges from Point 2.		The biotreater was in bypass mode at the time of the audit site inspection and Ampol reported it had been operating under bypass conditions for approximately 18 months. The limits for "Wet" were applied in assessing compliance with limits.	Compliant								
L3.6	For the purposes of Condition L3.4, phenols at Point 2 should be read as total phenolics.		Noted.	Noted								
L4 Waste												
L4.1	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below.</p> <p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below.</p> <p>This condition does not limit any other conditions in this licence.</p>	Interviews with site personnel Waste Management Sub Plan Site inspection observations	<p>The following waste was reported to be received at the premises:</p> <ul style="list-style-type: none"> Waste oil/hydrocarbon mixtures ('slops') transferred via pipeline from the Ampol Banksmeadow Terminal. Biosecurity wastes from ships. This waste is stored in dedicated bins at the Wharf before being transferred to a licenced facility. <p>J120 Waste from the Bankstown Terminal is specifically permitted to be received at the premises (row 3 of table).</p> <p>The auditor considers that biosecurity waste is permitted to be received at the premises under the category 'Waste' which has no restrictions on the 'Description', 'Activity' or 'Other Limits' (row 2 of table).</p>	Compliant								

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations																
	<table border="1"> <thead> <tr> <th>Code</th> <th>Waste</th> <th>Description</th> <th>Activity</th> </tr> </thead> <tbody> <tr> <td>NA</td> <td>General or Specific exempted waste</td> <td></td> <td></td> </tr> <tr> <td>NA</td> <td>Waste</td> <td></td> <td></td> </tr> <tr> <td>J120</td> <td>Waste oil/hydrocarbons mixtures/emulsions in water</td> <td></td> <td></td> </tr> </tbody> </table>	Code	Waste	Description	Activity	NA	General or Specific exempted waste			NA	Waste			J120	Waste oil/hydrocarbons mixtures/emulsions in water					
Code	Waste	Description	Activity																	
NA	General or Specific exempted waste																			
NA	Waste																			
J120	Waste oil/hydrocarbons mixtures/emulsions in water																			
L4.2	The licensee may receive used ballast and tank washing water from ships associated with the premises. The received ballast and tank washing water may be appropriately treated at the premises by the wastewater treatment plant. For the purposes of this licence, used ballast and tank washings from ships associated with the premises are not considered to be wastes.	Interviews with site personnel	Ampol reported that since the conversion to a terminal, the site has not received ballast or tank washing water from any ships.	Not triggered																
L4.3	The licensee may receive water and/or wastewater generated from the maintenance of product transfer pipelines associated with the premises. The received water and/or wastewater generated from the product transfer pipelines may be appropriately treated at the premises by the wastewater treatment plant. For the purpose of this licence water and/or wastewater received from product transfer pipelines is not considered to be a waste.	Interviews with site personnel	Ampol reported that the Kurnell Terminal receives low volumes of water / wastewater generated from the maintenance of product transfer pipelines and that this was treated at the WWTP.	Compliant																
L4.4	The licensee may receive biotreater sludge from another biological wastewater treatment plant in quantities sufficient for re-seeding (inoculating) the biological wastewater treatment plant (less than 500 tonnes per annum). For the purposes of this licence biotreater sludge is not considered to be a waste.	Interviews with site personnel	Ampol reported that since the conversion to a terminal, the site has not received biotreater sludge from another wastewater treatment plant for the purpose of re-seeding the WWTP.	Not triggered																
L4.5	The licensee may receive petroleum product mixtures known as "slops" from the Caltex Sydney Terminal at Banksmeadow (Licence 6950). The petroleum product mixtures must be received via pipeline only and either processed onsite or transferred to another refinery for reprocessing back into individual petroleum products. For the purposes of this licence, petroleum product mixtures are not considered to be a waste. Note: "Slops" is a general term used to describe petroleum product/s which do not meet the required product specification. It can be a mixture of two different petroleum products generated within a transfer pipeline when the remainder of one petroleum product is pushed through the pipeline using a second different product.	OEMP V3.0 9/02/2026 Interviews with site personnel	Petroleum slops (gasoline or diesel) generated during road tanker loading activities at the Banksmeadow Terminal are captured and returned to Kurnell via underground pipeline to onsite storage tanks where it is used for blending. Slops are also sent to the Wharf for back-loading to ships before being sent for redistribution to other storage terminals. There are four dedicated slops pipelines and six tanks.	Compliant																

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
L5 Noise Limits				
L5.1	Noise from the premises must not exceed: a) An LAeq(15 minute) noise emission criterion of 60dB(A) (7:00am to 6:00pm) seven days a week; and b) An LAeq(15 minute) noise emission criterion of 50dB(A) at all other times, and c) An LAmax noise emission criterion of 55dB(A) (10:00pm to 7:00am) except as expressly provided by this licence.	Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025	Ampol reported exceedances of the night-time noise limits due to shipping noise in its Annual Returns. Refer to C17 for further discussion.	Non-compliant
L5.2	Noise from the premises is to be measured or computed at any point within one metre of any affected residence to determine compliance with condition L5.1. 5dB(A) must be added if the noise is tonal or impulsive in character	Site inspection observations Interviews with site personnel Review of Shipping Noise Protocols, RWDI, 13/02/2026	Noise from the premises is measured at the Wharf using the SoundScience SmartData noise monitoring system which was developed by noise consultants Wilkinson Murray. This system continuously records noise levels, audio and meteorological data and predicts real-time noise levels at the six identified residential receivers. The Review of Shipping Noise Protocols required by EPL Condition E4 and undertaken by acoustic consultants RWDI, reported that the system does not apply a modifying factor correction for tonal noise, only low-frequency noise as informed by the 2018 study. Ampol reported that when the system was first developed in 2018, tonality was not a feature of the numerous night-time noise level measurements taken during ship berthing. Tonal noise was first observed in one of the sister ships in 2024 and then again when both sister ships were birthed at the Wharf in July 2025. In response, Ampol engaged RWDI to investigate the source of the tonal noise which was determined to be the IG system. As a correction factor for tonal noise was not included in the SoundScience Smart Data noise monitoring system, this condition was assessed as non-compliant. However, it is noted that tonal noise is a newly identified issue and that Ampol is in discussions with the EPA on the best way to manage tonal noise.	Non-compliant 2026 IEA REC 03 Review if a modifying factor is required for the tonal noise recently experienced from some ships, in consultation with acoustic consultants and the EPA.
L5.3	Where it can be demonstrated that direct measurement of noise from the premises is impractical, the EPA may accept alternative means of determining compliance. See Chapter 11 of the NSW Industrial Noise Policy January 2000 for general guidance on determining compliance.	2021 IEA Report, Lloyd's Register LRQA, August 2021 V3	The SoundScience system was developed and installed during the previous audit period. The 2021 IEA reported that a formal six month trial of the SoundScience noise monitoring system was undertaken in consultation with the NSW EPA concluding in 2018.	Compliant
L5.4	For the purposes of determining the noise generated at the premises the modification factors in Section 4 of the NSW Industrial Noise Policy must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.	Review of Shipping Noise Protocols, RWDI, 13/02/2026	Section 4 of the NSW Industrial Noise Policy includes that modifying factors should be applied for tonal noise characteristics. As reported in EPL L5.2, modification factors for tonal noise are not applied by the SoundScience Smart Data noise monitoring system.	Non-compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
L5.5	The noise emission limits identified in Condition L5.1 of this licence, apply under meteorological conditions of: a) Wind speed up to 3 m/s at 10 metres above ground level; and b) Temperature inversion conditions up to 3 degrees Celsius/100 metres and wind speed up to 2 m/s at 10 metres above the ground.		Noted. It was reported that the SoundScience system accounts for this and excludes results that do not meet the meteorological conditions relating to wind speed and temperature inversions are not included.	Noted
L6 Potentially offensive odour				
L6.1	The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.	Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025	Based on the number of complaints received, Ampol reported it was non-compliant with this condition in its Annual Returns to the EPA in 2021-2022, 2022-2023, 2023-2024 and 2024-2025. Refer Development Consent Condition C26.	Non-compliant
L6.2	No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997. Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.		Noted.	Noted
4 OPERATING CONDITIONS				
O1 Activities must be carried out in a competent manner				
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Site inspection observations Interviews with site personnel SAP PM M7 Operational Notification Management National Procedure, V2, 5/06/2023 Demonstration of SAP PM M7 system Terminal Bund Valve Position Checklist, January 2026 Monthly Tank Reel Gauging Checks, January 2026 Environmental Waste Log National Work Instruction Distribution 22/01/2026 Environmental Waste Log for Kurnell (demonstration of Sharepoint site) Demonstration of LMS (sighted evidence of completion of Environmental Awareness Part 1	Ampol has developed systems and processes to carry out activities in a competent manner including processing, handling, movement and storage of materials and waste. Examples sighted during the audit include: <ul style="list-style-type: none"> Ampol uses the SAP Preventative Maintenance (SAP PM) M7 system for creating and tracking operational tasks and planned preventative maintenance tasks. M8 is used for reactive maintenance tasks. Product receipt pipelines and product distribution pipelines are maintained in accordance with the SAP PM system. Product receipt pipeline are fitted with cathodic protection. Product storage is in above ground tanks fitted with overflow protection safeguards and located in bunded areas. Tank integrity testing is undertaken as per Ampol's Risk Based Inspection system by the engineering team. Bund walls are inspected as part of the routine T&I program at an approximate frequency of every 8-10 years. Bund valve positions are inspected routinely. Tank reel gauging checks are undertaken monthly. 	Compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
		& 2 by Operations Specialist and Operations Coordinator)	<ul style="list-style-type: none"> Waste is stored in dedicated bins (biosecurity bins at Wharf, segregated recycling bins for metal, pallets, empty drums, general waste bins). Excavated material (e.g. relating to remediation projects) is classified prior to disposal at appropriately licensed facilities. Wastewater is treated at the WWTP prior to discharge from EPL Point 2. Operator competency and training is managed through Ampol's LMS. Ampol operations personnel are required to complete on-line environmental awareness training which includes spill response and incident notification. Major contractors are required to be assessed for pre-qualification before being engaged to undertake work. Pre-qualification involves reviewing environmental and safety plans, injury and incident rates, environmental licences and insurances. <p>Not all aspects of the Kurnell Terminal's operations were considered or assessed under this condition. Based on the observations on site and documents provided, the Kurnell Terminal was assessed as generally compliant with this condition.</p>	
O2 Maintenance of plant and equipment				
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.		Refer Development Consent Condition B16	Compliant
O3 Dust				
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	Site inspection observations	Measures were being implemented to minimise the emissions of dust from the premises. Refer Development Consent Condition C27. Dust was not observed during the audit site inspection.	Compliant
O3.2	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	Site inspection observations	Measures were being implemented to minimise the emissions of dust from the premises. Refer Development Consent Condition C27. Dust was not observed during the audit site inspection.	Compliant
O4 Emergency response				
O4.1	The licensee must maintain, and implement as necessary, a current emergency response plan for the premises. The licensee must keep the emergency response plan on the premises at all times. The emergency response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. If a current emergency response plan does not exist at the date on which this condition is attached to the	Emergency Response Plan Pollution Incident Response Plan, V8, 26/06/2025 Site inspection observations	Ampol Kurnell Terminal has an extensive Emergency Response Plan (ERP) that is available in hard copy format at several locations at the Terminal including the Terminal Operations Building (at entrance), Emergency Operations Centre, Ampol Wharf Control Room and the Ampol Fire House. The ERP is also provided to a number of external agencies and is stored on the Ampol Intranet and Document Management System. The electronic version of the ERP was sighted during the audit site inspection. Kurnell Terminal also has a PIRMP as required by the Protection of the Environment Operations Act 1997. The PIRMP aligns with the ERP but includes additional details for reporting incidents which cause or	Compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	licence, the licensee must develop an emergency response plan within three months of that date.		threaten material harm to the environment. A copy of the PIRMP is located at the Emergency Operations Centre and a redacted version available on the Ampol website.	
O5 Processes and management				
O5.1	The licensee must ensure that any liquid and/or non liquid waste generated and/or stored at the premises is assessed and classified in accordance with the EPA Waste Classification Guidelines as in force from time to time.	Environmental Waste Log National Work Instruction Distribution 22/01/2026 Environmental Waste Log for Kurnell (demonstration of Sharepoint site) AECOM letter report dated 8/09/2023 providing waste classification of stockpiles from Tank 145 bunding area AECOM letter report dated 10/11/2025 providing waste classification of stockpiles from Tank 1, Zone 3 area	Ampol has developed processes for waste classification, generation and storage in accordance with the EPA Waste Classification Guidelines. These are described in the WMP and supported by other Ampol procedures including the Environmental Waste Log National Work Instruction Distribution. Kurnell maintains a Waste Log on the Ampol Sharepoint site. The Waste Log records the different waste types, their waste classification, quantity, transporter and disposal location. Files can be attached to each record including invoices, waste dockets and EPA Waste Tracking forms. The Waste Log was demonstrated to the auditors during the audit site inspection. Examples sighted included asbestos contaminated soils material transported by HiQ to its Cecil Park facility on 19/01/2026. HiQ Cecil Park is licenced to accept asbestos waste (EPA Licence no. 5186). The completed EPA online Waste Tracking Forms were observed to be attached to the entry. Where soil is excavated (for example as part of remediation projects) waste classification is conducted by environmental consultants. Sighted examples of waste classification reports provided by AECOM for stockpiles containing material excavated within the Tank 145 area and the Tank 1, Zone 3 area.	Compliant
O5.2	The licensee must ensure that waste identified for recycling is stored separately from other waste.	Environmental Waste Log for Kurnell (demonstration of Sharepoint site) Site inspection observations	The following waste streams were being recycled: empty drums, pallets and scrap metal. These were stored separately from other waste.	Compliant
O6 Other operating conditions				
O6.1	Use of biotreater wastewater treatment plant bypass			
O6.2	All wastewater must be treated using the biotreater wastewater treatment plant or the oil/water separators and induced air flotation system prior to discharge at point 2 (Yena Gap).	Interviews with site personnel Site inspection observations	At the time of the audit site inspection, the biotreater wastewater treatment plant was being operated in bypass mode and wastewater was being treated by the oil/water separators and induced air flotation system prior to discharge at point 2 (Yena Gap).	Compliant
O6.3	Wastewater that has passed through the oil/water separator can only bypass the biotreater wastewater treatment plant for treatment in the induced air flotation unit (IAF) when: 1. The influent flowrate exceeds the biotreater operational maximum treatment capacity and both the effluent diversion tank and the equalisation tank are more than 85% full, or 2. The transfer capacity of the diversion pumps and the equalisation tank feed pumps are insufficient to deal with the wastewater flow, or 3. The biotreater wastewater treatment plant is off line for essential maintenance, or	Annual Reviews 2022 – 2025 Monthly Summary Monitoring Data for Point 27, 2023-2024 (as published on Ampol website) Interviews with site personnel Site inspection observations	Ampol reported in its Annual Reviews that the biotreater was offline for maintenance for part of 2023, and for all of 2024 and all of 2025. A review of the monthly monitoring data available on the Ampol website for Point 27 for 2023-2024, indicates that the bypass limits were applied from July 2023.	Compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	<p>4. The pump capacity of the bypass pumps (number 15G-27) is being conducted to check maximum pump capacities and equipment availability, or</p> <p>5. The influent flowrate to the biotreater falls below its operational minimum treatment capacity (150kL/h).</p> <p>Note: The above bypass conditions may be varied in discussion with the licensee. In reviewing these conditions the EPA will take into consideration information including the frequency and duration of bypass events, monitoring data obtained under Condition M2 and the "Terminal Operations Wastewater Characterisation" Pollution Reduction Program.</p>			
O6.4	<p>Whenever wastewater bypasses the biotreater wastewater treatment plant and is discharged at Point 2 (Yena Gap), the licensee must maintain the flowrate through the biotreater wastewater treatment plant at its operational maximum treatment capacity, unless the biotreater wastewater treatment plant is off-line for essential maintenance or the influent flow rate to the biotreater falls below 150kL/h.</p> <p>Note: The biotreater bypass system (including the oil/water separators and induced air flotation system) is intended to act as a back-up system for the biotreater wastewater treatment plant.</p> <p>The intention of Conditions O6.1 to O6.4 is to ensure that the biotreater wastewater treatment plant is treating wastewater within its operational maximum and minimum treatment capacities before wastewater is directed to the biotreater bypass system.</p> <p>The "operational maximum treatment capacity" for the biotreater wastewater treatment plant is notionally 600kL/h. It may be less than 600kL/h depending on the number of "healthy" organisms in the biotreater wastewater treatment plant and the volume of wastewater stored in the equalisation tank.</p>	<p>Interviews with site personnel</p> <p>Site inspection observations</p> <p>Monthly Summary Monitoring Data for Point 27, 2023-2024 (as published on Ampol website)</p>	<p>The flowrate was not being maintained through the biotreater wastewater treatment plant as it was offline for maintenance. The biotreater wastewater treatment plant was being operated in bypass mode (using the oil/water separators and induced air flotation) since July 2023.</p> <p>Given the 'Note' to this condition, that the bypass system is intended to act as a back-up system for the biotreater wastewater treatment plant, it is recommended that Ampol consult with the EPA regarding EPL conditions O6.3 and O6.4.</p>	<p>Compliant</p> <p>2026 IEA OFI 21: Consult with the EPA regarding EPL conditions O6.3 and O6.4 given the length of time the wastewater treatment plant has been bypassing the biotreater and that bypassing the biotreater was intended to be a back-up system.</p>
O6.5	<p>The licensee must record the time, date, duration and reason of each biotreater wastewater treatment plant bypass event.</p>	<p>WWTP Shift Turnover sheets 28/01/2026 -1/02/2026</p>	<p>WWTP operators complete a WWTP Shift Turnover sheet which notes any issues with the plant and includes details such as the aeration tank pH, dissolved oxygen levels and digester rate. When the WWTP is operated in bypass mode, the aeration tank details are left blank as these are associated with the biotreater. Whilst this documents the date and indicates whether the biotreater is in use, it does not specifically address the requirement to record the time, duration and reason of each biotreater bypass event. However these details are able to be retrieved if required.</p> <p>As noted under Condition O6.3 and O6.4, the WWTP has been operating in bypass since July 2023. Ampol reported that this was due to biotreater maintenance.</p>	<p>Compliant</p>
5 MONITORING AND RECORDING CONDITIONS				

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
M1 Monitoring records				
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.		Noted. Refer M1.2 and M1.3	Noted
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	OEMP V3.0 9/02/2026	Section 6.6 of the OEMP states that environmental records are maintained for a minimum of 7 years. Environmental monitoring records are held by the Distribution Environment Team. Monitoring results are summarised on the Ampol website.	Compliant
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	Quarterly Groundwater Monitoring Q2 May 2025, WSP WSP Quarterly Groundwater Monitoring - Licence Well Records Q12021 – Q3 2025 Demonstration of LIMS system WWTP Monitoring Samples field sheet 20/02/2026 and 21/02/2026	Groundwater monitoring at EPL Points 15, 16, 28 and 29 was undertaken by environmental consultants, WSP during the audit period. The Quarterly Groundwater Monitoring Report for Q2 was reviewed and did not include the required records for the samples collected, however a separate table was provided which detailed the sampling point, date, time and sampler for the period Q1 2021 to Q3 2025. For effluent monitoring for Point 27, Ampol described that samples are taken by the WWTP Operator from the sampling port at the WWTP. These are then processed by the in-house Ampol laboratory which includes checking that the correct bottle was used and logging the date, time and sampler name in the Ampol LIMS (Laboratory Information Management System). External laboratory, ALS then picks up the samples for analysis. Ampol's LIMS system was demonstrated to the auditor. The auditor also interviewed the WWTP Operator responsible for taking the samples and sighted the field sheet completed for the WWTP Monitoring Samples. The name of sampler, date and time were observed to be recorded.	Compliant
M2 Requirement to monitor concentration of pollutants discharged				
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:		Noted. Refer EPL Condition M2.2 below.	Noted
M2.2	Water and/ or Land Monitoring Requirements Points 15,16 (refer to EPL for table of pollutants) Quarterly Point 27 (refer to EPL for table of pollutants) Monthly, Special Frequency 1, Special Frequency 2, continuous Points 28, 29 (refer to EPL for table of pollutants)	Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025 Quarterly Summary Monitoring Reports for EPL Monitoring Points 15, 16, 28 and 29 for 2025-2026, 2024-2025 (available on Ampol public website)	Groundwater monitoring has been conducted quarterly at EPL points 15, 16, 28 and 29 by environmental consultants WSP. A review of the Quarterly Summary Monitoring Data on the Ampol public website as well as the Annual Returns indicates that the required pollutants were being monitored at the required frequency. It is noted there were instances where wells were not sampled due to insufficient groundwater being present at the time of sampling.	Compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	<p>Quarterly</p> <p>Note: For the purposes of the table above for Point 27:</p> <p>a) Special Frequency 1 means once during any discharge.</p> <p>b) Special Frequency 2 means daily only during any discharge under biotreater wastewater treatment plant bypass conditions as specified in condition O6.3.</p> <p>c) any monitoring required for phenols is to be read as total phenolics</p> <p>d) the monitoring conducted at Point 27 is conducted to determine compliance with limits specified in Condition L3.4 for discharges from Point 2.</p> <p>Note: For the purposes of the table above for Points 15, 16, 28 and 29 above:</p> <p>a) Special Method 1 means recording of standing water level by measuring the depth to groundwater using an electronic dip meter with 1mm graduated tape; and</p> <p>b) The Standing Water Level is to be measured in metres as the depth below the top of the monitoring well casing.</p>	Monthly Summary Monitoring Reports for EPL Point 27 for 2023-2024, 2025 - 2026	For EPL Point 27, a review of the Monthly Summary Monitoring Data on the Ampol public website as well as the Annual Returns indicates that the required pollutants were being monitored at the required frequency.	
M3 Testing methods – concentration limits				
M3.1	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted	Interviews with site personnel	Ampol reported that monitoring was conducted in accordance with the Approved Methods Publication. This was not independently verified by the auditor.	Compliant
M4 Testing methods - load limits				
	Note: Division 4 of the Protection of the Environment Operations (General) Regulation 2022 requires that monitoring of actual loads of assessable pollutants listed in L2.2 must be carried out in accordance with the relevant load calculation protocol set out for the fee-based activity classification listed in the Administrative Conditions of this licence.		Noted.	Note
M5 Recording of pollution complaints				
M5.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	<p>Demonstration of LPS Database</p> <p>Interviews with site personnel</p> <p>Community Contact Log Register 2023 – 2025</p> <p>Community Contact Log Register 2026</p>	<p>Complaints were being recorded as Near Loss Incidents (NILs) in Ampol's LPS Database.</p> <p>In addition, the Community Engagement Manager maintains a Community Contact Log Register as an Excel spreadsheet to facilitate complaint reporting including monitoring trends.</p> <p>The LPS Database was demonstrated during the audit.</p> <p>Extracts of the Community Contact Log Register for the period 2023-2025 and 2026 were reviewed.</p>	Compliant
M5.2	<p>The record must include details of the following:</p> <p>a) the date and time of the complaint;</p> <p>b) the method by which the complaint was made;</p>	Community Contact Log Register 2023 – 2025	The review of the extracts of the Community Contact Log registers for the period 2023-2025 and 2026 indicated that the details required by EPL Condition M5.2 were maintained.	Compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	Community Contact Log Register 2026		
M5.3	The record must be produced to any authorised officer of the EPA who asks to see them.	Interviews with site personnel	Ampol reported that the EPA has not requested to see records of complaints.	Not triggered
M5.4	The record of a complaint must be kept for at least 4 years after the complaint was made.	OEMP V3.0 9/02/2026 Community Contact Log Register 2023 - 2025	Section 6.6 of the OEMP states that environmental records are maintained for a minimum of 7 years. It also states that LPS records which are closed are never removed from the LPS database. The extract of the Community Contact Log Register had data and graphs going back for more than 4 years.	Compliant
M6 Telephone complaints line				
M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	https://www.ampol.com.au/sustainability/environment/kurnell-refinery-conversion-project (accessed 12/02/2026) Interviews with site personnel	Ampol operates the Kurnell Community Hotline 1800 719 669 for the purpose of receiving enquires or complaints from members of the public. The Hotline is answered by an external agency and directed to the relevant Ampol contact.	Compliant
M6.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	https://www.ampol.com.au/sustainability/environment/kurnell-refinery-conversion-project (accessed 12/02/2026) https://www.ampol.com.au/support/get-in-touch (accessed 12/02/2026) Kurnell Community Update Nov 2025	The Kurnell Community Hotline 1800 719 669 is listed on the Ampol Kurnell Refinery Conversion Project webpage of the Ampol website and also on the Get in Touch webpage of the Ampol website. The Kurnell Community Hotline number is also included on Community Updates with a statement that the community can contact the hotline for enquires, questions or complaints.	Compliant
M6.3	The preceding two conditions do not apply until 3 months after the date of the issue of this licence.		Noted.	Note
M7 Requirement to monitor volume or mass				
M7.1	For each discharge point or utilisation area specified below, the licensee must monitor: a) the volume of liquids discharged to water or applied to the area; b) the mass of solids applied to the area; c) the mass of pollutants emitted to the air; at the frequency and using the method and units of measure, specified below.	WWTP Shift Turnover Sheet 28/01/2026 – 1/02/2026 Site inspection observations	A flow meter was installed at Point 27 to monitor the volume of treated wastewater discharged to the Yena Gap ocean outfall. The volume data is stored on Ampol's data server and recorded within a WWTP spreadsheet. It is also recorded on the WWTP Shift Turnover sheets.	Compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations						
	<p>POINT 27</p> <table border="1"> <thead> <tr> <th>Frequency</th> <th>Unit of Measure</th> <th>Sampling</th> </tr> </thead> <tbody> <tr> <td>Continuous during discharge</td> <td>kilolitres per day</td> <td>In</td> </tr> </tbody> </table>	Frequency	Unit of Measure	Sampling	Continuous during discharge	kilolitres per day	In			
Frequency	Unit of Measure	Sampling								
Continuous during discharge	kilolitres per day	In								
6 REPORTING CONDITIONS										
R1 Annual Return documents										
R1.1	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ol style="list-style-type: none"> 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. <p>At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.</p>	Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025	<p>Annual Returns were completed for the following reporting periods during the audit period:</p> <ul style="list-style-type: none"> • 02/05/2021 – 1/05/2022 • 2/05/2022 – 1/05/2023 • 2/05/2023 – 1/05/2024 • 2/05/2024 – 1/05/2025 <p>The Annual Returns were in the approved form and included the required statements of compliance and monitoring and complaints summary.</p>	Compliant						
R1.2	<p>An Annual Return must be prepared in respect of each reporting period, except as provided below.</p> <p>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</p>	Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025	Annual Returns were prepared for the audit period.	Not triggered						
R1.3	<p>Where this licence is transferred from the licensee to a new licensee:</p> <ol style="list-style-type: none"> a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. <p>Note: An application to transfer a licence must be made in the approved form for this purpose.</p>	Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025	The licence was not transferred during the audit period.	Not triggered						
R1.4	<p>Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:</p> <ol style="list-style-type: none"> a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or 	Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025	The licence was not surrendered or revoked during the audit period.	Not triggered						

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.			
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	EPA Public Register (accessed 12/03/2026)	Records of the date that Annual Returns were received are available on the EPA Public Register for EPL 837. A review of the Public Register indicated that the Annual Reviews for the audit period were submitted within 60 days of the end of the reporting period.	Compliant
R1.6	Where the licensee is unable to complete a part of the Annual Return by the due date because the licensee was unable to calculate the actual load of a pollutant due to circumstances beyond the licensee's control, the licensee must notify the EPA in writing as soon as practicable, and in any event not later than the due date. The notification must specify: a) the assessable pollutants for which the actual load could not be calculated; and b) the relevant circumstances that were beyond the control of the licensee.	Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025	The Annual Returns were completed in full.	Not triggered
R1.7	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025	Annual Returns were retained for at least 4 years. The auditor sighted historical Annual Returns maintained on Ampol's system.	Compliant
R1.8	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Annual Returns for EPL 837 for 2021-2022, 2022-2023, 2023-2024 and 2024-2025	The Annual Returns were signed by the Ampol Refineries (NSW) Pty Ltd Director and Company Secretary.	Compliant
R2 Notification of environmental harm				
	Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	Enforceable Undertaking 30/08/2023	The Guideline - Pollution Incident Response Management Plans (EPA, 2022) identifies the dictionary meaning of immediately is promptly and without delay. As the Enforceable Undertaking for the oily-water overflow incident on 7/04/2022 stated that "Ampol did not immediately notify the EPA, Fire and Rescue NSW, SafeWork NSW, Sutherland Shire Council or NSW Health of the Incident", this condition was assessed as Non-compliant. The auditor did not assess whether relevant authorities were notified immediately of incidents causing or threatening material harm to the environment.	Non-compliant 2026 IEA REC 04 Review incident notification requirements triggered by Condition D6 and EPL R2 and revise incident management processes, implement and train employees, as required.

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	<p><u>WWTP overflow</u></p> <p>Email from EPA re WWTP overflow incident acknowledging time on the phone dated 7/04/2022 (12:54 am)</p> <p>Email from EPA dated 07/04/2022 (7:26am) confirming actions discussed including visits by EPA officers and draft clean up notice</p> <p>Email from Ampol to EPA attaching R3 report 22/04/2022)</p> <p>Clean-up Notice (#3502297) 08/04/2022</p> <p>Variation of Notice of Clean-up Action (#3502452) 04/05/2022</p> <p>EPA letter dated 08/08/2022 Closing Out Clean-up Notice (#3502297)</p> <p>Clean-up Notice (#3505381) issued 16/08/2023 re Mangrove Area</p> <p>Enforceable Undertaking 30/08/2023</p> <p>Letter from EPA dated 30/04/2025 acknowledging Clean-up Notice 3505381 has been complied with <u>Pipeline Rupture</u></p> <p>Show Cause Letter issued by EPA 06/05/2024 re pipeline rupture incident</p> <p>Ampol response to Show Cause Letter 24/05/2024</p> <p>Official Caution issued by EPA 16/07/2024</p> <p><u>Sheen from ship</u></p> <p>Letter to EPA 10/12/2024 providing information requested re POLAR BRIGHT sheen incident</p> <p>Email to EPA submitting</p> <p>Email from EPA 6/12/2024 requesting further information</p> <p><u>Shipping noise impacts</u></p> <p>Email from EPA 11/07/2025 re noise complaints</p>	<p>The following incidents were reported to the EPA:</p> <ul style="list-style-type: none"> 7/04/2022 (approximately 12:06am): WWTP inundated with floodwaters and overflowed causing hydrocarbon impacted wastewater to escape into the environment. The EPA was contacted via telephone sometime before 12:54am (as evidenced by email from EPA thanking Ampol for their time). It is unknown whether this was via the Environment Line, however the auditor considers the requirement to notify the EPA immediately was met. 22/04/2024 (approximately 1:47pm) pipeline ruptured releasing gasoline onsite. The EPA was notified at approximately 2:50pm. It is unknown whether this was via the Environment Line. 5/12/2024 (approximately 6:15am): Oily sheen from ship POLAR BRIGHT berthed at Kurnell Wharf. EPA notified via telephone on 6/12/2024. It is unknown whether this was via the Environment Line. As this was reported to the EPA the following day, it is not considered to have met the requirement for immediate notification. 6-13/07/2025 shipping noise impacts from HAFNIA LARVIK and HAFNIA LILLESAND. It is understood that this was not notified as an incident via the Environment Line but rather the receipt of complaints were discussed with the EPA on 11/07/2025. 27/09/2025 (approximately 8:30am): Black smoke from ship FRONT CAPELLA berthed at Kurnell. EPA notified via Environment Line on 27/09/2025 (approximately 9am). The auditor considers the requirement to notify the EPA immediately was met. <p>In summary, notifications were generally made to the EPA via the Environment Line although some incidents may have been notified directly with Ampol's EPA contact.</p>	Compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
		<p>Advisory Letter issued by EPA 17/07/2025 re shipping noise impacts</p> <p>Ampol response to Advisory Letter re shipping noise impacts 06/08/2025</p> <p><u>Black smoke from ship</u></p> <p>Email to EPA 27/09/2025 notifying of complaints relating to ship emitting black smoke and advising EPA Environment Line was called.</p> <p>Email from EPA 29/09/2025 requesting further details of incident in form of R3 incident report</p> <p>Email to EPA providing R3 Incident Report 1/10/2025</p> <p>Email from EPA requesting further information following R3 Incident Report 2/10/2025</p> <p>Email to EPA providing requested information 3/10/2025</p>		
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident.	Refer evidence listed under R3.1	In general, notifications made via the Environment Line were followed up with emails to the EPA.	Compliant
R3 Written report				
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: <p>a) where this licence applies to premises, an event has occurred at the premises; or</p> <p>b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.</p>	Refer evidence listed under R3.1	<p>The following reports were requested and provided to the EPA:</p> <ul style="list-style-type: none"> 7/04/2022: WWTP overflow event. EPA requested an incident report be provided by 20/04/2022. Ampol provided the report on the 22/04/2022. 22/03/2024: Pipeline rupture. Incident report provided to EPA on 9/04/2024 (as referenced in Show Cause Letter). 5/12/2024: Oily sheen from POLAR BRIGHT. EPA requested report with additional information be provided by 10/12/2024. This was provided to the EPA via email on 10/12/2024. 6-13 July 2025: shipping noise impacts. EPA requested additional information. Ampol responded via email on 14/07/2025. EPA provided Advisory Letter dated 17/07/2025 outlining EPA determination and next steps including the provision of further information by 30/07/2025. Ampol responded to the Advisory Letter and provided the requested information by letter dated 6/08/2025. 	Compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
			<ul style="list-style-type: none"> 27/09/2025: Black smoke from FRONT CAPELLA. EPA requested written report with additional information be provided by 7/10/2025. This was provided by Ampol to the EPA via email on 1/10/2025. <p>In summary, Ampol responded to the requests of the EPA and provided written incident reports.</p>	
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Refer evidence listed under R3.1	Based on the evidence reviewed under R3.1, Ampol generally provided the requested written reports within or close to the specified timeframes.	Compliant
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	Refer evidence listed under R3.1	Based on the evidence reviewed under R3.1, the Incident reports provided by Ampol were considered to contain the information requested by the EPA.	Compliant
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Email from EPA requesting further information following R3 Incident Report for black exhaust from ship at Wharf 2/10/2025 Email to EPA providing requested information 3/10/2025 Advisory Letter issued by EPA 17/07/2025 re shipping noise impacts Ampol response to Advisory Letter re shipping noise impacts 06/08/2025	The EPA requested further details following the submission of R3 incident report relating to the black exhaust from the ship at the Wharf. This was provided via email dated 3/10/2025. The EPA requested further information following the submission of the report relating to shipping noise impacts. This was provided by letter dated 6/08/2025.	Compliant
7 GENERAL CONDITIONS				
G1 Copy of licence kept at the premises or plant				
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Interviews with site personnel	Ampol reported that the EPL is available on the Kurnell Home SharePoint site.	Compliant
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Interviews with site personnel	Ampol reported that the EPA has not requested to see a copy of the EPL.	Not triggered

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Interviews with site personnel	Ampol reported that the EPL is available on the Kurnell Home SharePoint site.	Compliant
G2 Signage				
G2.1	The location of EPA point number(s) 2, 15, 16, 27, 28 and 29 must be clearly marked by signs that indicate the point identification number used in this licence and be located as close as practical to the point.	Site inspection observations	EPA Points 15, 16, 27, 28 and 29 were observed to be clearly marked by signs during the audit site inspection. EPA Point 2, the Yena Gap ocean outfall was not inspected.	Compliant
G3 Other general conditions				
G3.1	Completed Programs & Special Conditions (refer tables in EPL) Deleted PRPs and Special Conditions (refer tables in EPL)		Noted.	Note
8 SPECIAL CONDITIONS				
E1 SC E16: Remediation Action Strategy				
E1.1	The licensee must implement the "Caltex Kurnell Remediation Action Strategy" (RAS) dated December 2019 or as otherwise revised (including subsequent addendum reports referred to in the Strategy). The RAS provides details of remediation works which will be undertaken by the licensee to address legacy contamination at the site. Reporting Unless otherwise agreed in writing by the EPA, the licensee must prepare and submit to the EPA an annual written report by the end of November each year providing updates on the progress of the remediation works detailed in the RAS, including any changes to timeframes identified in the RAS. Completion Date: 30 November each year Note: The licence may be varied in discussion with the licensee should any additional data gaps be identified through the implementation of the RAS.	Caltex Kurnell Remediation Action Strategy 18/12/2019 Caltex Kurnell Remediation Action Strategy Addendum Report – Pipeways 12/05/2020 Kurnell Terminal RAS Update, November 2021 Kurnell Terminal RAS Update, November 2022 Kurnell Terminal RAS Update, November 2023 Kurnell Terminal RAS Update, November 2024 Kurnell Terminal RAS Update, November 2025	Kurnell RAS update reports were provided annually to the EPA by 30 November for the audit period. Reports included a progress update of remediation works in each area identified in the RAS. A works progress summary table was provided as Attachment 1 which includes the RAS planned commencement, actual commencement and current status. The 2025 RAS Update indicates that remediation in 14 of the identified areas had been completed with the remaining seven areas reported as in-progress.	Compliant
E2 SC E17: Tank Turnaround and Inspection Program				
E2.1	Pollution Reduction Program U16.2: Implementation of the Tank Sleeve Program required the licensee to upgrade a number of gasoline storage tanks with emissions reduction devices to reduce emissions of benzene and Volatile Organic Compounds (VOC) emissions. During the program, the licensee expanded the scope of the program to include number of additional tanks that would be upgraded at the premises as part of the licensee's maintenance/turnaround and inspection program (T&I). These tanks included 204, 318, 408, 409, and 513. The licensee has committed to continue upgrading these tanks in accordance with the T&I schedule.	Interviews with site personnel T&I Program – Tank Sleeve Installation Annual Reports for 2021 - 2025 Email to EPA dated 30/10/2025 submitting T&I Program Tank Sleeve Installation Annual Report for 2025	Tank Sleeve Program update reports were provided to the EPA by 30 October each year. The T&I Program – Tank Sleeve Installation – Annual Report for October 2025 indicated that the program is expected to be closed out by the end of 2026. The following tanks had been updated with emissions reduction devices prior to 2025: Tk204, Tk318, and Tk408. Tk409 was returned to service in July 2025 with emissions control systems installed. The remaining tank Tk513 was taken out of service in October 2025 and is scheduled to be returned to service in the second half of 2026.	Compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	<p>The licensee must prepare and submit to the EPA a written report providing an update on the progress of the following:</p> <ul style="list-style-type: none"> a) identification of the tanks that have been upgraded b) identification of the remaining tanks requiring upgrade c) an update of the tank upgrade program schedule <p>Completion Date: 30 October each year</p> <p>Note: The licensee has advised that the inspection frequencies and maintenance programs at the premises are reviewed from time to time and optimised based on a risk-based inspection program. The program schedule may be subject to change as a result of the review process. The program schedule will be completed upon the upgrade of the five identified tanks.</p>			
E3 SC E20: PFAS Risk Monitoring and Remediation Works				
E3.1	<p>The licensee must undertake an annual sampling program to identify and respond to PFAS substances have the potential to migrate off the premises.</p> <p>The sampling program must, at a minimum, monitor and assess PFAS concentrations at:</p> <ul style="list-style-type: none"> a) groundwater transects as identified in the "PFAS Sampling and Analysis Quality Plan (SAQP)" dated December 2022; b) northern pipeline right of way; c) surface water discharge points; and d) Privately owned bores in the Kurnell residential area, when requested by the bore owner. <p>Surface water sampling must be undertaken quarterly, and groundwater sampling must be undertaken biannually.</p> <p>The sampling program must provide an assessment of the risk profile to receptors.</p> <p>Notification</p> <p>Ampol must notify the EPA in writing within 7 days if there are any increases to the site's risk profile, or material changes in the Conceptual Site Model which may result in an increase in the risk to off-site receptors.</p> <p>Ampol must consider appropriate human health and species protection criteria when assessing the PFAS sampling results.</p>	<p>PFAS 2025 Sampling Program Scope of Works, WSP, 11/03/2025</p> <p>Email from WSP dated 6/03/2026 re PFAS Monitoring update</p>	<p>This condition was included in the EPL on 15/10/2024. WSP was engaged to undertake the annual sampling commencing in 2025. An email from WSP confirmed that the 2025 PFAS monitoring program was successfully completed in November 2025 and that WSP was finalising the 2025 Summary report for submission to the EPA in March 2026. Ampol advised that the 2026 PFAS monitoring was underway with the Q1 2026 sampling event completed on 6/03/2026.</p> <p>As the report presenting the results was yet to received, the requirement for notification if there is an increase to the risk profile was not triggered.</p>	Compliant
E3.2	<p>The licensee must undertake appropriate remediation works to mitigate the offsite migration of PFAS, including but not limited to the following PFAS contaminated areas:</p> <ul style="list-style-type: none"> a) the Former Caltex Lubricating Oil Refinery (CLOR); and b) the Former Fire Training Area (FTA) 	Interviews with site personnel	Ampol was in the process of preparing its first annual update to the EPA which is due on 31/03/2026.	Not triggered

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	<p>The licensee must prepare and submit to the EPA an annual update by the end of March each year (commencing March 2026) on the following:</p> <ul style="list-style-type: none"> - all targeted PFAS remedial works, including at the CLOR, FTA and surrounding areas; - future scopes for PFAS related remediation; - PRB improvement works or alternatives for reducing offsite PFAS migration from surface water at the stormwater drain that runs towards the southern boundary of the site; - phasing out of PFAS stored on site; - disposal of PFAS and any PFAS contaminated material (Soils, IBCs etc.); and - any other PFAS related work Ampol has undertaken throughout the year. <p>Completion Date: 31 March each year</p>			
E4 SC E21: Review of Shipping Noise Protocols				
E4.1	<p>Background</p> <p>From 6 to 10 July 2025, the Kurnell community was impacted by excessive noise from sister ships berthed at the Kurnell Wharf one after the other. The design of these particular ships is what contributed to the noise impacts. The licensee previously engaged Wilkinson Murray to produce a report titled "Caltex Kurnell Wharf Noise Monitoring" dated December 2018 (Noise Report). The Noise Report includes protocols for monitoring and responding to elevated noise from ships berthed at the Kurnell Wharf. This condition requires the licensee to review and improve its protocols to reduce the risk of shipping noise impacting the community.</p>		Noted	Noted
E4.2	<p>By 5 December 2025 the licensee must nominate a suitably qualified and experienced independent professional/s (Professional) to the EPA to review the Noise Report and identify improvements that can be made to current protocols to prevent the risk of excessive noise from shipping activities. At a minimum, the review must include recommendations for: 1. A detailed protocol for assessing ships that pose an elevated risk of emitting excessive noise and identifying whether they have sufficient mitigation measures in place to prevent noise impacts on the Kurnell community. The protocol must outline that ships with an elevated noise risk and insufficient mitigation measures are not to be permitted to discharge product at the Kurnell Wharf. 2. A detailed protocol for managing and responding to both noise readings above the limits in condition L5.1 and community complaints of excessive noise. The protocol must include: a. Immediate steps to reduce shipping noise levels. b. Steps for notifying the EPA via an initial phone call or email by 5pm the next business day after a noise</p>	Review of Shipping Protocols, RWDI, 13/02/2026	<p>Acoustic consultants, RWDI, was engaged to conduct the review of shipping noise protocols. The Review of Shipping Protocols report (13/02/2026) states that nomination of RWDI to undertake the review was made via email on 21/11/2025 and approved by the EPA by email dated 24/11/2025.</p> <p>The review includes a detailed protocol for assessing ships that pose an elevated risk of emitting excessive noise and identifying whether they have sufficient mitigation measures in place (Section 4.1).</p> <p>The review also includes a detailed protocol for managing and responding to noise readings above the limits and community complaints of excessive noise (Sections 4.2 and 4.3).</p>	Compliant

Reference No.	Condition	Evidence	Independent Audit Findings	Compliance Status and Recommendations
	exceedance or receipt of a community complaint. c. A procedure that includes corrective actions for any ship that creates excess noise, including ceasing the discharge of product between the hours of 6pm to 7am if noise impacts continue and cannot be mitigated.			
E4.3	By 13 February 2026 the licensee must provide the EPA with a report written by the Professional outlining the findings of condition E4.2. Note: Based on the results of this report, the EPA may implement further licence conditions regarding noise management.	Review of Shipping Noise Protocols, RWDI, 13/02/2026 Email to EPA dated 13/02/2026 attaching Report	The RWDI Review of Shipping Noise Protocols report was submitted to EPA on 13/02/2026. Ampol reported that it met with the EPA on site on 19 March 2026 to discuss the findings of the RWDI report and tour the Wharf.	Compliant

Appendix B: 2021 IEA Action Plan Review

Appendix B 2021 IEA Action Plan Review

Table B-1 Review of implementation of recommendations from 2021 IEA

Reference No.	Finding	Recommendation (Options)	Ampol Response	2026 Audit Review
Condition C4B	<p>Site Emergency Response Plan (ERP)</p> <p>Ampol was unable to provide evidence that the updated ERP (referring to Tank demolition works) was submitted to the NSW DPIE, as required by MOD3 - Tank 101 Demolition</p> <p>Applicable Consent Condition: C4B</p> <p><u>Mitigating Evidence</u></p> <p>Documents were presented to show that the Kurnell Emergency Response Plan (CD2037) was reviewed and updated in January 2018 and that Pre-Fire Tank Plans and ERP Scenario Guidance Note -Tank Fire exists. These documents confirms that Ampol had the capability to response to a tank fire, particularly one associated with an emptied/cleaned tank. IDS (Demolition specialist) also prepared a Demolition Plan for Tanks 101 that included mitigation measures to prevent fire occurrence during demolition works and emergency response.</p> <p>Specific to Tank 101, an AECOM letter sent to DPIE (dated 03/10/2017) was produced to confirm that Tank 101 had been emptied, isolated from all energy sources, opened (access lids), cleaned and vented for several months in preparation for demolition. In addition, residual testing confirmed nil hydrocarbons present.</p>	<p>Sighted subsequent approvals and associated communications between Ampol and DPIE</p> <p>Noted that other Reports and Plans sampled (including sub-plans) have been submitted and approved within required timeframes. Better diligence demonstrated across the consent condition requirements with key evidence retained in Project files under specific consent conditions. Cintellate used for action sign off.</p> <p>Continue adherence to sound records management for all Project documents and submissions to third parties, (plans, reports, etc.) by ensuring:</p> <p>a) future Project leads and team members are inducted to the records management requirements for all Project documents, plans, reports and their submission to third parties, etc., as needed</p> <p>b) Action sign off/verification includes a check for correct record retention and evidence of submissions made (as required)</p>	<p>While Ampol accepted the audit findings, comments and recommendations, significant work and oversight has gone into improving and sustaining adherence to sound records management for all Project documents and submissions to third parties, (plans, reports, etc.).</p> <p>There were a number of reporting commitments to DPIE (now DPPI) and EPA during the period 4th Qtr. 2017 to March 2020 (when the project concluded) and this single event should be considered as an “outlier”.</p> <p>We will use this NC as a “shared learning” opportunity to reinforce the importance of sound records management practices for all project works and reporting commitments to third parties, such as regulators.</p> <p>The outcomes of this audit and the recommendations will be communicated to all Fuels and Infrastructure groups.</p>	<p>Evidence of submission of documents to DPPI was available for plans submitted during the audit period.</p> <p>This recommendation is considered closed.</p>

Appendix C: DPHI Audit Team Approval

Department of Planning, Housing and Infrastructure

NSW Planning ref: SSD-5544-PA-38

Amanda Basten
EMS Specialist
AMPOL REFINERIES (NSW) PTY LTD
11/09/2025

Sent via the Major Projects Portal only

Subject: Kurnell Refinery Conversion - Independent Auditor Endorsement

Dear Mrs Basten

I refer to your request for the Planning Secretary's endorsement of suitably qualified, experienced, and independent person/s to conduct an Independent Audit of the Kurnell Refinery Conversion Facility (the **development**), submitted as required by Schedule D, Condition D7(a) of SSD-5544 as modified (the **consent**) to NSW Department of Planning, Housing and Infrastructure (**NSW Planning**) on 4 September 2025.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent.

In accordance with Schedule D, Condition D7(a) of the consent and the NSW Planning, *Independent Audit Post Approval Requirements (2020)*, as nominee of the Planning Secretary, I endorse the following independent audit team:

- Helen Onus from Ethos Environmental P/L (Lead Auditor), and
- Jenny MacMahon from MacMahon Consulting P/L (Assistance Auditor).

Please note:

- This correspondence must be appended to the Independent Audit Report.
- The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the NSW Planning *Independent Audit Post Approval Requirements (2020)*. Failure to meet these requirements will require revision and resubmission.
- The above audit team is approved for the current operational audit only. Additional approval must be sought from the Planning Secretary for future audits of the development.
- Any change to the auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.
- The Lead Auditor must attend the site inspection component of the audit.

Department of Planning, Housing and Infrastructure

- The audit period is the day after the site inspection date of the previous audit, to the final site inspection date of the current audit.

Notwithstanding the endorsement of the above independent audit team for the project, each respective project approval or consent requires a request for endorsement of the independent auditor or audit team be submitted to NSW Planning, for consideration of the Planning Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

Should you wish to discuss the matter further, please contact Maria Divis, Senior Compliance Officer on 02 8275 1156 or email compliance@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "Julia Pope".

Julia Pope
Team Leader Compliance - Metro
Compliance

As nominee of the Planning Secretary

Appendix D: Consultation with Key Government Agencies

From: [REDACTED]@dpiensw.gov.au>
Sent: Monday, 12 January 2026 2:30 PM
To: helen.onus@ethosenvironmental.com.au
Cc: [REDACTED]
Subject: RE: Ampol Kurnell Terminal Independent Environmental Audit - SSD 5544

Flag Status: Flagged

Hi Helen,

Thank you for consulting with us regarding the upcoming independent environmental audit (IEA) for **SSD 5544 – Kurnell Refinery Conversion**.

In reference to Condition D7(b) of the Consent, you have advised Ethos Environmental intends to consult with the NSW Planning, NSW EPA and Sutherland Shire Council in relation to the scope of the audit. In addition, NSW Planning requests that 'Fire and Rescue NSW' also be consulted about audit scope to obtain any feedback on compliance with relevant consent conditions regarding emergency management, fire safety, and incident response.

We concur with the auditor's approach that historical construction and demolition activities that were completed outside of this audit period (Feb 2021 to Feb 2026) do not need to be assessed and verified, although this audit should verify if actions taken to close out non-compliances that were identified in the previous IEA published in August 2021 (Ref: MEL4000225) have been completed satisfactorily.

We concur that in accordance with Condition D7(c), the auditor should examine whether the development has complied with the requirements of EPL 837 in consultation with the EPA.

Regarding the scope of this upcoming audit, grateful if special attention is given to the following areas:

- On 20 November 2025, NSW Planning notified Ampol Refineries that they were in technical breach of Conditions D7 & D8 of the Consent as an IEA had not been submitted within the approved timeframe. The IEA was originally due on 30 August 2024, and NSW Planning granted an extension of time for this audit to be completed by 30 August 2025. No further extensions of time were granted. This audit should note the above breach and recommend what corrective actions can be taken to ensure it does not happen in future.
- On 23 April 2025, NSW Planning received Ampol Refineries' Hazard Audit for the period July 2021 to October 2024 (Ref: J-000774-01). Appendix A of this Hazard Audit listed a number of incidents and near misses, six of which resulted in loss of containment and posed potential environmental harm. For example, on 4 April 2022, the Kurnell Terminal WWTP overflowed due to heavy rain, discharging water containing hydrocarbon residues onto Captain Cook Drive and surrounding areas. In relation to these reported incidents and potential incidents, please assess whether Ampol Refineries complied with its incident response and reporting obligations under Conditions D3, D5 and D6 of the consent.

If you have any questions regarding the feedback above, please feel free to contact me directly.

Kind regards,

[REDACTED]

Senior Compliance Officer

NSW Planning | Department of Planning, Housing and Infrastructure

T [REDACTED] | M [REDACTED] | E [REDACTED]@dpie.nsw.gov.au

Locked Bag 5022 | PARRAMATTA NSW 2124

www.dpie.nsw.gov.au



The Department of Planning, Housing and Infrastructure acknowledges the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

If you are submitting a compliance document or request as required under the conditions of consent or approval, please note that the Department is no longer accepting lodgement via compliance@planning.nsw.gov.au.

The Department has recently upgraded the Major Projects Website to improve the timeliness and transparency of its post approval and compliance functions. As part of this upgrade, proponents are now requested to submit all post approval and compliance documents online, via the Major Projects Website. To do this, please refer to the instructions available [here](#).

From: helen.onus@ethosenvironmental.com.au <helen.onus@ethosenvironmental.com.au>

Sent: Wednesday, 7 January 2026 12:21 PM

To: [REDACTED]@planning.nsw.gov.au; [REDACTED]@dpie.nsw.gov.au>

Subject: Ampol Kurnell Terminal Independent Environmental Audit - SSD 5544

Hi [REDACTED] and [REDACTED],

Ethos Environmental has been endorsed by the DPHI to undertake the 2025 Independent Environmental Audit of the Ampol Kurnell Terminal located at 2 Solander Street, Kurnell, as required by its Development Approval SSD-5544.

Condition D7, of the Project Approval requires that:

Within a year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:

- (a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- (b) include consultation with the relevant agencies;*
- (c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL and/or Water License (including any assessment, plan or program required under these approvals);*
- (d) review the adequacy of any approved strategy, plan or program required under these approvals; and*
- (e) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.*

Condition D7(b) and Section 3.2 of the Department's *Independent Audit Post-approval Requirements, May 2020*, requires that the auditor consults with Department, who may request other parties or agencies are consulted, including the Community Consultative Committee Chairperson, to obtain input into the scope of the audit. We are planning on consulting with the EPA and Sutherland Shire Council. Are there any other relevant agencies the Department requests us to consult with?

We are planning to conduct the site inspection for the audit in mid-February 2026. The audit period is 25 February 2021 (previous audit) to February 2026.

With regards to the audit scope, we note the construction and demolition activities associated with the conversion project were completed outside the audit period and assessed and verified in the previous IEAs. We do not plan to re-assess conditions specific to these activities and instead will focus on the ongoing and general conditions. Also, as Condition D7(c) specifically requires an assessment of compliance with any relevant EPL, we intend to include EPL 837 in the audit scope. Does the Department agree with this approach?

We look forward to your response.

Kind regards,

Helen Onus
Director – Environment

Ethos Environmental Pty Ltd

M: [REDACTED]

Helen.onus@ethosenvironmental.com.au

From: [REDACTED]@epa.nsw.gov.au>
Sent: Friday, 13 February 2026 9:47 AM
To: helen.onus@ethosenvironmental.com.au
Subject: RE: Ampol Kurnell Termina 2025 Independent Environmental Audit

Flag Status: Flagged

Hi Helen

Thanks for your email regarding the upcoming Independent Environmental Audit (IEA) on the Conditions of Approval issued to Ampol Refineries (NSW) Pty Ltd.

The EPA recommends particular focus on the following aspects for the audit:

- Odour management systems and procedures. Over the years the EPA has received some odour complaints relating to Ampol's activities. Ampol have made a number of improvements, however we still occasionally receive complaints, particularly during periods of rainfall. The most recent complaints were from the night of 17 January 2026.
- Measures in place to mitigate the transport of contaminants offsite via groundwater (hydrocarbons and PFAS)
- Shipping noise is another issue that we sometimes receive complaints about, however Ampol are currently reviewing their management practises as required under Special Condition E21 in the EPL.
- Adequacy of and compliance with site surface water controls and discharges

Happy to discuss if you have any questions.

Regards

[REDACTED]
Operations Officer
NSW Environment Protection Authority
D [REDACTED]



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The EPA acknowledges the traditional custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.
Report pollution and environmental incidents 131 555 or +61 2 9995 5555

From: helen.onus@ethosenvironmental.com.au <helen.onus@ethosenvironmental.com.au>
Sent: Monday, 9 February 2026 10:51 AM
To: [REDACTED]@epa.nsw.gov.au>
Subject: Ampol Kurnell Termina 2025 Independent Environmental Audit

Hi [REDACTED],

Ethos Environmental has been endorsed by the Department of Planning, Housing and Infrastructure (DPHI) to undertake the 2025 Independent Environmental Audit of the Ampol Kurnell Terminal located at 2 Solander Street, Kurnell, as required by its Development Approval SSD-5544.

Condition D7, of the Project Approval requires that:

Within a year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:

- (a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- (b) include consultation with the relevant agencies;*
- (c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL and/or Water License (including any assessment, plan or program required under these approvals);*
- (d) review the adequacy of any approved strategy, plan or program required under these approvals; and*
- (e) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.*

Condition D7(b) and Section 3.2 of the Department’s *Independent Audit Post-approval Requirements, May 2020*, requires that the auditor consults with relevant agencies to obtain input into the scope of the audit.

As a significant stakeholder we are seeking your input into the audit scope and feedback concerning the environmental performance of the Kurnell Terminal during the audit period, taken from 25 February 2021 (previous audit) to February 2026 (date of planned site inspection).

As per Condition D7(c), the audit will include an assessment of compliance with EPL 837, however if there are any issues in particular that you would like the audit to consider, please let us know.

To assist you with your feedback we have provided a list of questions that may help structure your response; however, it is not mandatory that the questions are answered. Please feel free to respond in any manner that suits you or your agency. Your response can be either via email or we can discuss your response over the phone at a time convenient to you.

Question	Response
What has been the EPA’s involvement with Ampol Kurnell Terminal during the audit period?	
Has EPA conducted an inspection of the site during the audit period? If so, when was the site last inspected?	
Are there past or recent compliance issues, such as fines, notices, correspondence or enforcement actions you are aware of concerning the site? If so have these been addressed by Ampol? Are there outstanding actions?	
Has the EPA received any community complaints regarding operations at Kurnell Terminal? Were these satisfactorily addressed?	
Are there any positive comments regarding environmental management at Ampol Kurnell Terminal?	

Are there any areas you would like the independent environmental audit to focus on?

We are planning to conduct the site inspection for the audit next Monday (16 February 2026) and would appreciate a response before then, if possible.

Kind regards,

Helen Onus
Director – Environment

Ethos Environmental Pty Ltd


Helen.onus@ethosenvironmental.com.au

This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the Environment Protection Authority.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

From: [REDACTED]@ssc.nsw.gov.au <[REDACTED]@ssc.nsw.gov.au>
Sent: Tuesday, 17 March 2026 12:04 PM
To: helen.onus@ethosenvironmental.com.au
Subject: RE: [CAUTION: SUSPECT SENDER] FW: Independent Environmental Audit of Ampol Kurnell Terminal - SSD 5544 - Sutherland Shire Council Consultation

Hi Helen,

Apologies for the delay in responding to your email. We are going through a restructure and document transfer process and it has been difficult to obtain the necessary information in a timely manner.

If you require any further information regarding the below, please let me know.

Kind regards,

[REDACTED]
Environmental Management – Team Leader | Environment and Regulation
[REDACTED]
[REDACTED]@ssc.nsw.gov.au
sutherlandshire.nsw.gov.au



We acknowledge the traditional owners of the land on which we live, and pay our respects to elders past and present.



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From: helen.onus@ethosenvironmental.com.au <helen.onus@ethosenvironmental.com.au>
Sent: Monday, 9 February 2026 10:31 AM
To: [REDACTED]@ssc.nsw.gov.au <[REDACTED]@ssc.nsw.gov.au>
Subject: [CAUTION: SUSPECT SENDER] FW: Independent Environmental Audit of Ampol Kurnell Terminal - SSD 5544 - Sutherland Shire Council Consultation

Hi [REDACTED],

Hope all is well. I am resending this in case it got missed in the January holiday period.

We are conducting the audit site inspection next Monday (16 February) and whilst not essential, it would be good to get your response before then, in case there was anything on site you wanted me to look at.

Kind regards,

Helen Onus
Director – Environment

Ethos Environmental Pty Ltd

Helen.onus@ethosenvironmental.com.au

From: helen.onus@ethosenvironmental.com.au <helen.onus@ethosenvironmental.com.au>
Sent: Wednesday, 7 January 2026 11:06 AM
To: [REDACTED] <[\[REDACTED\]@ssc.nsw.gov.au](mailto:[REDACTED]@ssc.nsw.gov.au)>
Subject: Independent Environmental Audit of Ampol Kurnell Terminal - SSD 5544 - Sutherland Shire Council Consultation

Hi [REDACTED],

Ethos Environmental has been endorsed by the Department of Planning, Housing and Infrastructure to undertake the 2025 Independent Environmental Audit of the Ampol Kurnell Terminal located at 2 Solander Street, Kurnell, as required by its Development Approval SSD-5544.

Condition D7, of the Project Approval requires that:

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- (a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- (b) include consultation with the relevant agencies;*
- (c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL and/or Water License (including any assessment, plan or program required under these approvals);*
- (d) review the adequacy of any approved strategy, plan or program required under these approvals; and*
- (e) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.*

Condition D7(b) and Section 3.2 of the Department’s *Independent Audit Post-approval Requirements, May 2020*, requires that the auditor consults with relevant agencies to obtain input into the scope of the audit.

As a significant stakeholder we are seeking your feedback concerning the environmental performance of the Kurnell Terminal during the audit period, taken from 25 February 2021 (previous audit) to February 2026 (date of planned site inspection).

To assist you with your feedback we have provided a list of questions that may help structure your response; however, it is not mandatory that the questions are answered. Please feel free to respond in any manner that suits you or your agency. Your response can be either via email or we can discuss your response over the phone at a time convenient to you.

Question	Response
What has been Council’s involvement with the Kurnell Terminal during the audit period?	Review and approval of Development Applications including remediation of land. Review of DN’s. GIPA requests. Discussions around subdivision and divestment of Ampol under-utilised land. Ongoing discussions regarding the cleanup of an oil spill into Mangroves that occurred in April 2022 and the relationship to the mass death of mangroves. Subsequent spill of 1500Lts of fuel onsite in 2024. Approvals to install groundwater monitoring wells within council owned land adjacent to Ampol.

Has Council conducted an inspection of the site during the audit period? If so, when was the site last inspected by the Council ?	Council have conducted site visits in relation to Development Applications and the sub-division proposal. Councils last inspection of limited areas of the site relative to the subject being discussed was June 2024.
Are there past or recent compliance issues such as fines, notices, correspondence or enforcement actions you are aware of concerning the site? If so have these been addressed by Ampol? Are there outstanding actions?	Yes. Unauthorised use of a portion of the site leased to an external company (CBOX) by Caltex without a DA approval between December 2020 and December 2022. After investigations by and discussions with Councils compliance officer, a DA was lodged.
Has Council received any community complaints regarding operations at the Kurnell Terminal? Were these satisfactorily addressed?	Council has received many complaints from the community regarding the oil spill in 2022 and the impacts on mangrove deaths in Quilbray Bay. Other complaints include odours from a Stormwater Drain coming from the Ampol Site and suspected oil film on the water surface in the stormwater drain from Marton Park Wetland which shares a border with Ampol and takes some of its stormwater. The stormwater drain issues were addressed satisfactorily. The oil spill and potential impacts on Mangroves is ongoing and is currently sitting with the EPA.
Are there any positive comments regarding environmental management at the Kurnell Terminal?	Ampol is actively cleaning up the site and is happy to share results with Council when requested, and particularly if it can assist with a Council project.
Are there any areas you would like the independent environmental audit to focus on?	Ensuring the ongoing environmental improvements at the site to limit potential environmental impacts on the surrounding community are ongoing – including ongoing remediation works and ensuring stormwater and spills are managed onsite. Ensuring that ongoing remediation and management in the area identified for sub-division / divestment will remain with Ampol and is not handed over to a third party through the sale of land.

We are planning to conduct the site inspection for the audit in mid-February 2026.

Kind regards,

Helen Onus
Director – Environment

Ethos Environmental Pty Ltd


Helen.onus@ethosenvironmental.com.au

From: [REDACTED]@fire.nsw.gov.au >
Sent: Wednesday, 11 February 2026 12:46 PM
To: helen.onus@ethosenvironmental.com.au
Cc: Fire Safety
Subject: RE: Ampol Kurnell Terminal Independent Environmental Audit

Hi Helen,

As per our discussion this afternoon, FRNSW have had no involvement in any environmental auditing.

FRNSW engagement with the site has primarily been the provision of advice to DPHI via the Major Projects Portal and legislated consultation on Emergency Planning. As such, FRNSW cannot speak to compliance issues related to the site which should be directed to SafeWork as the regulator of Major Hazard Facilities.

Regards,
Luke



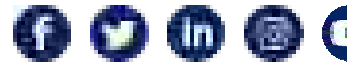
A / SUPERINTENDENT [REDACTED]
Manager Fire Safety
Fire Safety Liaison Unit | Fire and Rescue NSW

E: [REDACTED]
T: [REDACTED]

1 Amarina Ave, Greenacre, NSW 2190 | Locked Bag 12, Greenacre, NSW, 2190

PREPARED FOR ANYTHING.

www.fire.nsw.gov.au



From: helen.onus@ethosenvironmental.com.au <helen.onus@ethosenvironmental.com.au>
Sent: Monday, 9 February 2026 3:21 PM
To: Fire Safety <FireSafety@fire.nsw.gov.au>
Subject: FW: Ampol Kurnell Terminal Independent Environmental Audit

Helen Onus
Director – Environment

Hello,

Ethos Environmental has been endorsed by the Department of Planning, Housing and Infrastructure (DPHI) to undertake the 2025 Independent Environmental Audit of the Ampol Kurnell Terminal located at 2 Solander Street, Kurnell, as required by its Development Approval SSD-5544.

Condition D7, of the Project Approval requires that:

Within a year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:

- (a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;
- (b) include consultation with the relevant agencies;
- (c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL and/or Water License (including any assessment, plan or program required under these approvals);
- (d) review the adequacy of any approved strategy, plan or program required under these approvals; and
- (e) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.

Condition D7(b) requires that the auditor consults with DPHI, who may request other parties or agencies are consulted, to obtain input into the scope of the audit.

We contacted DPHI in January and they requested that we also consult with Fire and Rescue NSW to obtain any feedback on compliance with relevant consent conditions regarding emergency management, fire safety, and incident response.

To assist you with your feedback we have provided a list of questions that may help structure your response; however, it is not mandatory that the questions are answered. Please feel free to respond in any manner that suits you or your agency. Your response can be either via email or we can discuss your response over the phone at a time convenient to you.

The audit period is 25 February 2021 (previous audit) to February 2026.

Question	Response
What has been Fire and Rescue NSW involvement with Ampol Kurnell Terminal during the audit period?	
Has Fire and Rescue NSW Council conducted an inspection of the site during the audit period? If so, when was the site last inspected?	
Are there past or recent compliance issues, for example relating to incidents and emergencies, concerning the site? If so have these been addressed by Ampol? Are there outstanding actions?	
Are there any positive comments regarding environmental management at Ampol Kurnell Terminal?	
Are there any areas you would like the independent environmental audit to focus on?	

We are planning to conduct the site inspection for the audit next Monday (16 February 2026) and would appreciate a response before then, if possible.

Kind regards,

Helen Onus
Director – Environment

Ethos Environmental Pty Ltd

M: [REDACTED]

Helen.onus@ethosenvironmental.com.au

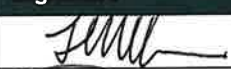
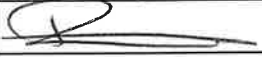
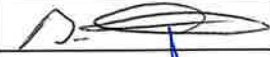





Appendix E: Opening and Closing Meetings

Meeting Attendance Record

Meeting Purpose: Opening meeting Project: Ampol Kurnell Terminal 2025 IEA

Date: 16/2/26 Time: 8:45 am

Location: Ampol Kurnell Terminal, 2 Solander Street Kurnell

Name	Role	Signature
Jenny MacMahon	Auditor (Ethos)	
Roo Hassan	Op's Specialist	
Bill Bath	Op's Specialist	
John Arundananathan	Terminal Operations Manager	
JAMANDA BASTEN	EMS Specialist	
Dylan Wood	Op's Specialist	
John Dougall	Project Engineer	
Helen onus	Lead auditor	

Meeting Attendance Record

Meeting Purpose: *Close out meeting* Project: Ampol Kurnell Terminal 2025 IEA

Date: *24/2/26* Time: *1pm - 1:20pm*

Location: Ampol Kurnell Terminal, 2 Solander Street Kurnell

Name	Role	Signature
<i>Helen onus</i>	<i>Lead Auditor</i>	<i>[Signature]</i>
<i>AMANDA BASTEE</i>	<i>EMS Specialist</i>	<i>[Signature]</i>
<i>Jos Kusters</i>	<i>National Environment Man</i>	<i>[Signature]</i>
<i>Myller Vallejo</i>	<i>Environment Specialist</i>	<i>[Signature]</i>
<i>DANIEL PEYRAS</i>	<i>PROJECTS LEAD</i>	<i>[Signature]</i>
<i>Phil Hutson</i>	<i>Environment Specialist</i>	<i>[Signature]</i>
<i>Dan Scully</i>	<i>Community Engagement Mgr</i>	<i>[Signature]</i>

Appendix F: Independent Audit Declaration Form

Declaration of Independence Form

Declaration of Independence - Auditor

Project Name:	Ampol Kurnell Terminal Conversion
Consent Number:	SSD 5544
Description of Project:	Conversion of the Kurnell Refinery into a Terminal and operation of the Terminal
Project Address:	2 Solander Street Kurnell NSW 2231
Proponent:	Ampol
Date:	20 March 2026

I declare that:

- I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- I am not an Environmental Representative for the project; and
- I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

- Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Proposed Auditor: Helen Onus

Signature:



Qualification: BSc Environmental Biology, Masters Environmental Management, Exemplar Global Certified Lead Auditor (#11149)

Company: Ethos Environmental Pty Ltd

Declaration of Independence Form

Declaration of Independence - Auditor

Project Name:	Ampol Kurnell Terminal Conversion
Consent Number:	SSD 5544
Description of Project:	Conversion of the Kurnell Refinery into a Terminal and operation of the Terminal
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Date:	20 March 2026

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- I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- I am not an Environmental Representative for the project; and
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- The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Proposed Auditor: Jenny MacMahon

Signature:



Qualification:

- Certified Environmental Practitioner (CEnvP No 1438)
- Lead Auditor – ISO 14001:2015, Environmental Management and Regulatory Compliance Audit (Exemplar Global No. 209824)
- Bachelor of Science (Chemistry Major) - UNSW

Company: MacMahon Consulting Pty Ltd