

Senate Standing Committee on Environment and Communications
Legislation Committee
Answers to questions on notice
Environment portfolio

Question No: 164
Hearing: Supplementary Budget Estimates
Outcome: Agency
Programme: Great Barrier Reef Marine Park Authority
Topic: Project plan for responding to ANAO findings
Hansard Page: 35-36
Question Date: 19 October 2015
Question Type: Spoken

Senator Waters asked:

Senator WATERS: In relation to the recent ANAO audit on permit assessments, which demonstrated that there was some room for improvement in the authority's permit conditions compliance area, can you give me an update on the steps that you are taking to address those recommendations?

Dr Reichelt: I will ask Mr Elliot to take us through those.

Mr Elliot: The actions that have been undertaken so far include: we have developed a four-year project plan to address both the recommendations in the ANAO report plus the actions that were in the Great Barrier Reef strategic assessment program report, which also had some actions that related to our permission system.

Senator WATERS: Sorry, could you just speak up a little?

Mr Elliot: Yes. What I said was that we have developed a project which is a multiyear, four-year, project and that project plan is already in place. It includes both addressing the ANAO recommendations plus the recommendations or commitments that were in the Great Barrier Reef strategic assessment program report, some of which related to our permission system as well.

Senator WATERS: Is that project plan available publicly?

Mr Elliot: The project plan is not available publicly, but we can provide it if you would like.

Answer:

The project plan for the Assessment and Decision Enhancement Project is attached (**Attachment A**). This project is responding to the following ANAO recommendations:

1. Processing of permit applications
2. Permit application assessment
3. Permit decisions and approval conditions.

Project Plan (Revision 0)

Project Title:	Assessment & Decision Enhancement
Project Number:	47
Branch:	Biodiversity Conservation & Sustainable Use
Section:	Environmental Assessment & Protection

This project plan is a managed document. Version history is tracked through The Dock. The below table only captures formal endorsement of plan iterations by the project sponsor.

Table 1: Endorsement history table

Project Plan Endorsement History			
Version N°.	Version name	Date endorsed	Endorsed by (Name, position, project role)
V1.0	Project Manager endorsed version	21-Apr-15	Rachel Reese, Manager Strategy Development (Project Manager)
V1.7	Project Manager endorsed revised version (minor updates)	29-Apr-15	Rachel Reese, Manager Strategy Development (Project Manager)
V2.0	Director approved and submitted to Project Sponsor (GM)	30-Apr-15	Kirstin Dobbs, Director EAP (Project Director)
V3.0	Endorsed by Project Sponsor	11-May-15	Bruce Elliot, GM BCSU (Project Sponsor)
V4.0	Project Manager endorsed version reflecting major change to RIS process & timelines	18-Jun-15	Rachel Reese, Manager Strategy Development (Project Manager)
V5.0	Changes approved by Project Director	23-Jun-15	Kirstin Dobbs, Director EAP (Project Director)
V6.0	Changes approved by Project Sponsor	2-Jul-15	Bruce Elliot, GM BCSU (Project Sponsor)
V7.0	Project Manager endorsed version reflecting moderate change to timelines - No RIS required	24-Sep-15	Rachel Reese, Manager Strategy Development (Project Manager)
V8.0	Director endorsed version reflecting moderate change to timelines - No RIS required	25-Sept-15	Kirstin Dobbs, Director EAP (Project Director)
V9.0	Project Manager endorsed version reflecting moderate change to budget & tasks - 3 contract work packages	19-Oct-15	Rachel Reese, Manager Strategy Development (Project Manager)
V10.0	Project Director endorsed version reflecting moderate change to budget & tasks - 3 contract work packages	19-Oct-15	Kirstin Dobbs, Director EAP (Project Director)

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Background

In August 2014, the [Great Barrier Reef Region Program Report](#) ('Program Report') identified enhancements to the permission system required to support approval of GBRMPA for a class of actions under the EPBC Act.

In May 2014, the Australian National Audit Office ('ANAO') launched a [performance audit of GBRMPA's permissions systems](#). This is expected to result in a number of recommendations related to how GBRMPA assesses and decides permit applications.

In March 2015, the [Reef 2050 Long-Term Sustainability Plan](#) ('LTSP') identified a range of actions to protect the values of the Great Barrier Reef.

As a result, this 5-year project (Jan 2015 to Jan 2020) aims to undertake a major review and revision of the EIM Policy and its supporting suite of guidelines and procedures. New policy documents and internal procedures may be required, and legislative amendments to the GBRMP Regulations are needed to meet the objectives of the Program Report, ANAO findings, LTSP and broader agency requirements. This includes incorporating the work already done to review the EIM policy in 2014.

Note that two Program Report commitments related to the permission system are out of scope for this project, as they are being delivered as separate, stand-alone projects:

1. Strengthening Permissions Compliance
2. Hydrodynamic Modelling Guidelines update.

Outcomes - Why is this project being undertaken?

Strategic alignment

Corporate Plan 2014-2019

This project supports and aligns with **Strategy 3: Effective and efficient environmental regulation** including the following commitments:

- Streamline, harmonise and enhance regulatory tools to reduce unnecessary burden while maintaining strong levels of environmental protection and enhance alignment with other similar or relevant legislation;
- Enhance alignment of the permission system with EPBC Act assessment processes;
- Strengthen guidelines to include new and revised standards for ecosystem health and develop new guidelines to complement existing arrangements; and
- Strengthen protection of heritage values.

Annual Operating Plan 2014-2015

This project supports and aligns with the following **Priority Projects** in the Agency [AOP](#):

1. Regulatory and Policy Reform
 - a. HOW: This project is the primary vehicle for delivering the Regulatory and Policy Reform priority project through the permission system. Other aligned projects (such as Cumulative Impact and Net Benefit) also support this overarching priority project. Coordination of the various projects has not yet been realised.
2. Supporting Reef 2050 Long-Term Sustainability Plan
 - a. HOW: A large number of actions in the LTSP may be implemented (partially or fully) through the permission system. While the LTSP actions do not have timeframes, this project will begin the work of scoping actions for implementation through the permission system and will seek to deliver on any high priority actions requiring short-term implementation.
3. Integrated Monitoring and Reporting Program
 - a. HOW: While the RIM Rep program is still being scoped, it is likely that GBRMPA will seek to incorporate new monitoring and reporting requirements through permits. This project will coordinate with the RIM Rep project to ensure good alignment in objectives and deliverables.
4. Standards and Thresholds
 - a. HOW: Permit assessment processes and permit conditions will require updating to reflect the new standards and thresholds. This project will coordinate with the Standards & Thresholds project to ensure good alignment in objectives and deliverables.
5. Plans of Management Review

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- a. HOW: Plans of Management are primarily implemented through the permission system. Permit assessment processes and permit conditions will require updating to reflect the new POMs. This project will coordinate with the POM reviews to ensure good alignment in objectives and deliverables.
6. Heritage Strategy
 - a. HOW: Permit assessment processes and permit conditions will require updating to reflect the new Heritage Strategy. This project will coordinate with the Heritage Strategy project to ensure good alignment in objectives and deliverables.
7. Indigenous Heritage Strategy
 - a. HOW: Permit assessment processes and permit conditions will require updating to reflect the new Indigenous Heritage Strategy. This project will coordinate with the Indigenous Heritage Strategy project to ensure good alignment in objectives and deliverables.
8. Fishing Strategies to Protect Biodiversity
 - a. HOW: Permit assessment processes and permit conditions will require updating to reflect the new Fishing Strategies work. This project will coordinate with the Fishing Strategies project to ensure good alignment in objectives and deliverables.
9. Strengthening Permissions Compliance:
 - a. HOW: While the scope of this project is limited to permit assessment and decision phases (with a separate EAP project addressing the compliance phase), the guidelines and procedures used during assessment and decision-making play a key role in supporting later compliance activities. The lack of clear guidelines and procedures increases the risk of inconsistency, which in turn limits GBRMPA's ability to successfully implement different compliance responses.

In addition to the Priority Projects in the Agency AOP, this project also delivers on or supports the following **Foundational & Strengthening** actions in the AOP:

1. Implementation of Program Report Commitments
 - a. HOW: This project will lead the implementation of most Part C commitments (being those related to the assessment and decision phases of the permission system) and coordinate deliverables with other projects leading other commitments from Part C.
2. ANAO Review
 - b. HOW: This project will lead the response to ANAO findings related to the assessment and decision phases of the permission system, including an implementation plan to identify how and when responses will be implemented.
3. Legislation - Annual Regulatory Plan
 - c. HOW: This project will lead the development of the policy intent for amendments to Regulations amendments identified in the Program Report and other critical amendments related to the permission system.
4. Environmental Impact Assessments
 - d. HOW: Another team in EAP is responsible for the day-to-day work of assessing and deciding permit applications. This project will however result in changes to the way that team works, so close consultation is required.
5. Management of Defence activities
 - e. HOW: Another team in EAP is responsible for the day-to-day work of assessing and deciding Defence proposals. This project will however result in changes to the way that team works, so close consultation is required. In particular, this project will deliver new guidelines for assessing Part 5 notifications.
6. ICT Strategic Plan Implementation - Reef Management Systems
 - f. HOW: This project will coordinate with the RMS Project to ensure deliverables are aligned in both scope and implementation timeframes.
7. Corporate Governance Plan - Integrated Risk Management Framework
 - g. HOW: Following on from coUaboration in 2013-14, this project will coordinate with Corporate Governance to ensure the revised Environmental Impact Assessment risk management framework is consistent with the overall agency risk management framework.
8. Social & Economic Program
 - a. HOW: The Social & Economic Program includes the development of social and aesthetic guidelines. Permit assessment processes and permit conditions will require updating to reflect the new social and aesthetic guidelines. This project will coordinate to ensure good alignment in objectives and deliverables.
9. Heritage Assessment Guidelines

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- a. HOW: Permit assessment processes and permit conditions will require updating to reflect the new Heritage Assessment Guidelines. This project will ensure good alignment in objectives and deliverables.

10. EPBC Act and QLD Coordination

- h. HOW: This project will align GBRMPA's processes with EPBC Act processes and provide input from an EAP perspective to an MOU with Queensland.

Project outcomes

Outcome 1: Approved class of actions - EPBC Act approval is implicit for activities wholly within the GBRMP that receive a permission under the Zoning Plan

This project has the lead role in delivering on these related Program Report commitments:

- **89** Measures to enhance alignment of permission system with EPBC Act assessment processes.
- **811** Improving assessment of matters of national environmental significance.
- **819** Improving consultation arrangements.
- **C1** The Authority will require consideration of relevant EPBC policy documents, including relevant significant impact guidelines, in the scoping phase of the permission assessment and decision process.
- **C2** The Authority will require consideration of prudent and feasible alternatives which may have a lower impact on the environment as part of the scoping phase of the permission assessment and decision process - and amend its policy documentation to include reference to this requirement.
- **C3** Where an action is likely to have a significant impact on a matter of national environmental significance within the Marine Park, the Authority will require applicants to consider:
 - o the impacts of actions on matters of national environmental significance and relevant attributes and environmental processes as described in the Strategic Assessment Report, and as amended in accordance with the Authority's policy review procedures;
 - o impacts (including direct, indirect and cumulative impacts) arising from the development action in the context of all impacts affecting the matters of national environmental significance.
- **C4** Where an action is likely to have a significant impact on a matter of national environmental significance within the Marine Park, the Authority will consider any relevant: international conventions, Commonwealth- state agreements, plans of management, recovery plan, wildlife conservation plan, threat abatement plan, approved conservation advice under the EPBC Act, EPBC Act guidelines, policies and information - in assessing and determining permissions under its permission system.
- **C5** The Authority will consider relevant Department of the Environment policy documents, guidelines, plans of management and other online data sources available on the Department's website in its scoping, assessment and decision-making process.
- **C7** The Authority will amend its Permit Application Form to include a section which specifically addresses matters of national environmental significance.
- **CB** The Authority will seek to pursue amendments to the Great Barrier Reef Marine Park Regulations 1983 to explicitly outline the levels of assessment under the permission system.
- **C9** The Authority will update its permissions guidance material to outline the general information requirements for applicants according to the level of assessment.
- **C10** The Authority will seek to pursue amendments to the GBRMP Regulations (in particular Regulation 128) to ensure continued application of fees for the Authority's assessment of activities that are covered by an approval granted under section 146 of the EPBC Act (Part 10 - Strategic Assessments).
- **C11** The Authority will publish notification of all permit applications on the internet as soon as practicable after receiving a permit application.
- **C12** The Authority will seek to pursue amendments to the GBRMP Regulations (in particular Regulation 880) to require advertising of applications where the granting of a permission may restrict the reasonable use by the public of a part of the Marine Park or is likely to have a significant impact on the Marine Park, including on matters of national environmental significance.
- **C13** Relevant policies will be updated to explicitly state that appropriate consultation will be undertaken with persons or organisations, including Commonwealth and State government agencies, whose functions, interests or activities could be impacted by the proposed activity.
- **C16** Amend policies and guidance material used in the determination of permissions so they explicitly require the consideration of matters of national environmental significance and relevant attributes, including:
 - o biodiversity and environmental processes
 - o Indigenous and historic heritage values

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- o community benefits derived from the environment, including those not easily represented or measured (such as aesthetic values).
- **C22** Develop guidance material to assist in determining the acceptability of impacts. Criteria shall include consistency of assessment outcomes with regulatory objectives, outcomes for the Marine Park, including matters of national environmental significance and relevant GBRMP Act and EPBC Act guidelines and standards.
- **C26** Develop specific guidance documents for notifications under Part 5 of the Zoning Plan to make reference to consideration of matters of national environmental significance under the EPBC Act. AND
- **C27** The Authority will integrate relevant components, as required, of the Department of the Environment's EPBC Act assessment templates and manuals into its assessment documents as they are reviewed and updated.

Outcome 2: Other Program Report commitments are implemented through the permission system (as appropriate)

Other teams in GBRMPA are developing key policy documents which require implementation, in part or wholly, through the permission system. This project's role is to implement the new policy through the GBRMPA permission system, including:

- Implementation of *Net Benefits Policy* (with Reef 2050)
- Implementation of *GBR Offsets Guidelines* (with Reef 2050)
- Implementation of *Cumulative Impact Assessment Guidelines* (with Reef 2050)
- Implementation of *Underwater Noise Impact Guidelines* (with Reef Recovery)
- Implementation of *GBRMP Heritage Strategy* (with Reef 2050)
- Implementation of *Information Management System Improvements* (with IMSAT - for RMS)
- Implementation of *Regional Standards & Thresholds* (with Reef Recovery)
- Implementation of *Indigenous Heritage Strategy* (with Indigenous Partnerships)
- Implementation of *Integrated Monitoring & Reporting Framework* (with Reef 2050)
- Coordination with *Strengthening Permission System Compliance* project (with EAP).

This will require early and frequent engagement with the above project teams to ensure their project outputs have "real life workability" and can be implemented through the permission system with minimal effort.

Outcome 3: An implementation plan is endorsed to deliver improvements to the permission system to address ANAO findings and critical agency needs

The ANAO review will result in findings and recommendations in mid-2015. This project will respond to those findings by incorporating improvements that can be made immediately and by submitting for endorsement a costed Implementation Plan for a future suite of permission system enhancement work (for those improvements not able to be implemented immediately).

In addition, the following Program Report commitment encompasses other enhancements that are deemed critical by the Authority in order to modernise, streamline and enhance the permission system:

- **C31** The Authority will investigate and implement opportunities through its ongoing regulatory reform processes to:
 - o enhance the effectiveness of its permission system to achieve objectives and outcomes for the protection and management of the Marine Park, including matters of national environmental significance
 - o harmonise requirements with relevant Commonwealth and state legislation and reduce regulatory burden.
- **B26** Increasing emphasis on use of modelling.

GBRMPA has already committed to some critical improvements including:

1. Review of inspection requirements for different facilities (RPEQ, etc);
2. Guidelines for bonds;
3. End-of-life requirements for facilities, such as decommissioning and removal; and
4. Public gazettal of all permit-related decisions (for example, modifications to permit conditions).

Other critical enhancements will be identified in the early stages of the project and incorporated where feasible.

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Outcome 4: Reef 2050 Long Term Sustainability Plan outcomes are achieved through the permission system

This project will consider commitments in the LTSP and incorporate these where possible. Commitments that can't be immediately incorporated will be rolled into the Implementation Plan (see Outcome 3) for future work.

Outcome 5: Applicants and assessors have a clear understanding of changes and the tools to successfully respond to or implement these changes.

A critical project outcome is that the changes are clearly communicated to stakeholders and that GBRMPA staff have the resources to successfully implement the changes. Deliverables will be designed as much as possible to serve a dual purpose - guidance for assessors and for applicants. It is envisioned that all of the project deliverables will be publicly available on GBRMPA's website.

A key supporting project for this outcome is the development and implementation of the new Reef Management Systems tool.

Outputs - What will the project deliver?

In scope

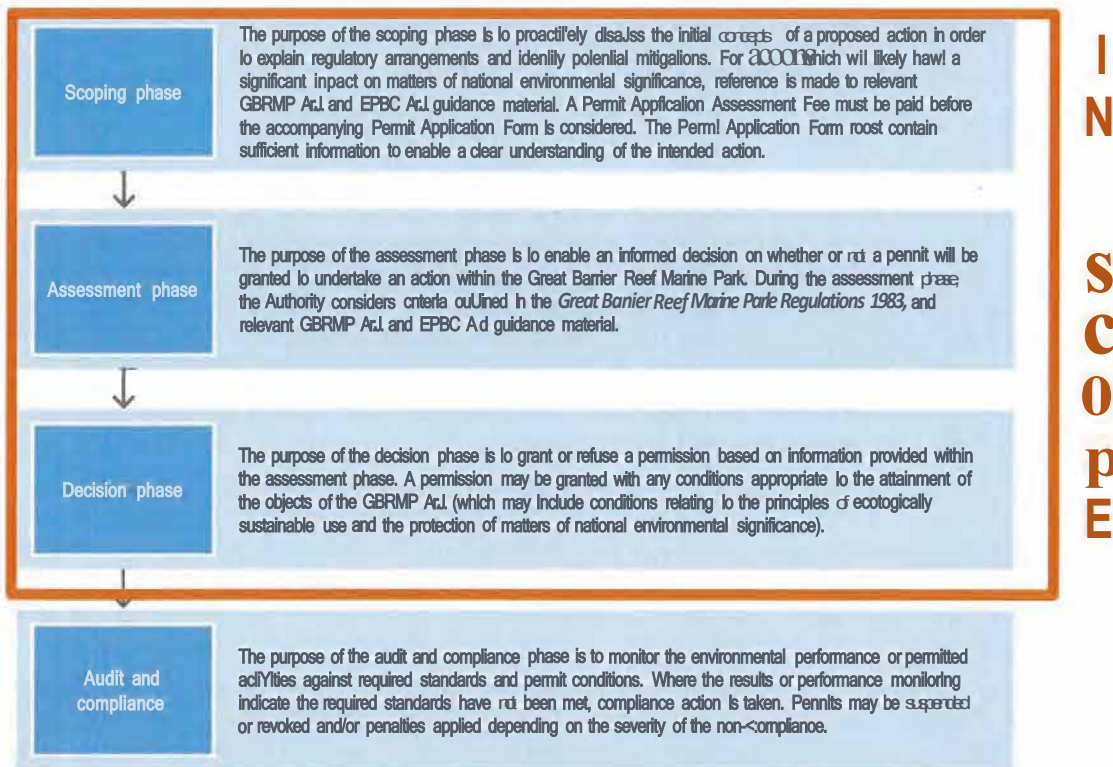
This is a 5-year project running from January 2015 to January 2020. The initial 2% years are scoped in detail (January 2015 to July 2017), while the remaining 2% years (July 2017 to January 2020) will be scoped in future as more detail becomes available regarding LTSP and Program Report projects in the 5-year bracket (delivery by Aug 2019).

The scope of work for the project only relates to Assessment & Decision processes, which are defined as:

Policies, guidelines, procedures & other matters related to the Scoping, Assessment and Decision phases of the permission system.

Compliance processes are out of scope and are being managed and delivered by EAP's Protection Strategies & Systems team. Compliance processes are defined as:

Policies, guidelines, procedures & other matters related to the Audit & Compliance phase of the permission system.



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The scope of this project includes the following as they relate to Assessment & Decision processes:

- Fulfilling EAP's commitments in Part C of the Program Report, including seeking Ministerial approval of GBRMPA for an approved class of action;
- Responding to ANAO Issues Papers and the Final Report, including an Implementation Plan for any proposed changes that are beyond the scope of this project;
- Identifying and prioritising other permissions systems enhancements (for example, review of RPEQ requirements) and implementing these in concert with committed changes, if resources allow;
- Identifying how Long Term Sustainability Plan outcomes can be achieved through the permission system; and
- Updating class assessments based on the new policies and guidelines.

It should be noted that the following activities are within scope of this project but rely on another section to first develop the relevant policy/guideline. EAP's role is to implement the new policy/guideline through its permission system, as appropriate.

- Implementation of Net Benefits Policy (with Reef 2050)
- Implementation of GBR Offsets Guidelines (with Reef 2050)
- Implementation of Cumulative Impact Assessment Guidelines (with Reef 2050)
- Implementation of Underwater Noise Impact Guidelines (with Reef Recovery)
- Implementation of GBRMP Heritage Strategy (with Reef 2050)
- Implementation of Social Impact Assessment Guidelines and Procedures (With Reef 2050)
- Implementation of Aesthetics Impact Assessment Guidelines and Procedures (With Reef 2050)
- Implementation of Regional Standards & Thresholds (with Reef Recovery)
- Implementation of Indigenous Heritage Strategy (with Indigenous Partnerships)
- Implementation of Integrated Monitoring & Reporting Framework (with Reef Recovery).

This project relies heavily on delivery of the Information Management System Improvements project by IMSAT. Further upgrades to Reef Management Systems (RMS) will be required to enable many permission system enhancements (and likely ANAO recommendations) to be implemented. Input to RMS is in scope for this project insofar as it relates to new requirements from EAP. Existing business requirements for RMS will continue to be led by EAP's PSS team. Discussions are underway with PSS and IMSAT about the best mechanism for coordinating EAP input to RMS.

Scope changes are recorded in Attachment E.

Out of scope

The Strengthening Permissions Compliance (Priority Project GBRMPA AOP 2014-2015) project is out of scope. Consequently, implementation of Program Report commitments and ANAO recommendations related to Compliance processes (such as auditing, monitoring and reporting on compliance with permits) is out of scope. There are strong dependencies and interconnectedness between this project, the Strengthening Permissions Compliance project and the other aligned projects being led by other teams. Coordination between the various projects is not yet formalised, so close engagement is required.

Updating the Hydrodynamic Modelling Guidelines is out of scope. This is being scoped and delivered as a stand-alone project by EAP, subject to resource availability.

Also out of scope is updating the various templates and business procedures that relate to the permission system. These are unlikely to require significant changes, and any changes should be able to be rolled out gradually *over* time as resources allow. An Implementation Plan will be developed at the end of this project which identifies this future work. The project team has allocated 30% of its time from January to June 2017 to assist other EAP teams with any immediate updates that may be required to templates and business procedures.

Also out of scope is any input to, or implementation of, aligned projects which do not deliver the required outcomes within 5 years (that is, within the timeframe of this project). This includes future input to RMS beyond January 2020. It is also likely that some aligned projects which are due to be finalised by August 2019 may not deliver "shovel-ready" outcomes, suitable for implementation through the permission system.

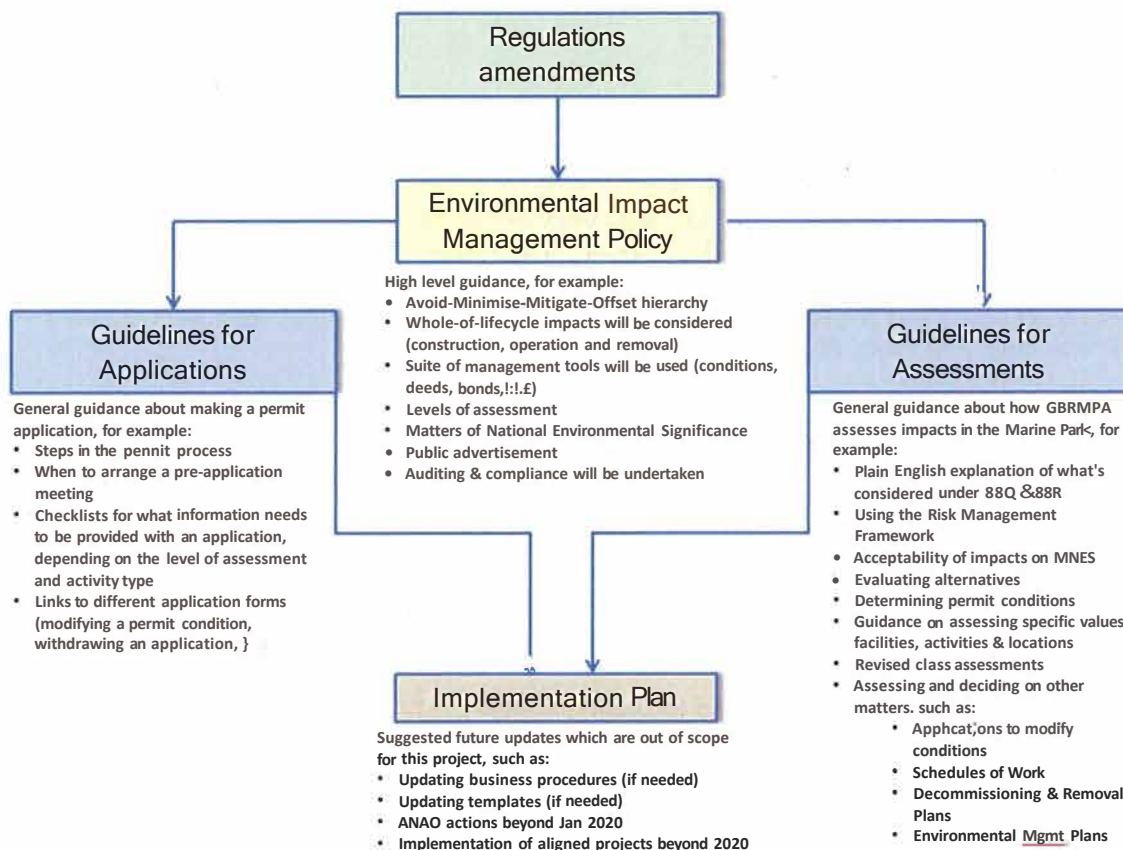
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This future work would need to be rolled into EAP's day-to-day workload, or alternately a new project scoped and resourced to implement these further actions. An Implementation Plan will be developed at the end of this project which identifies future work.

Scope changes are recorded in **Attachment E**.

Deliverables

While deliverables will be fleshed out as the project progresses (and particularly subject to ANAO recommendations and discussions with the Department), the following are currently anticipated as broad packages of deliverables:



A [detailed list of deliverables](#) has been developed.

Constraints

Table 2: Table of project constraints

Constraint	Explanation of the constraints' influence on the project
Critical dependencies on other projects	A number of Program Report commitments refer to <i>implementation</i> of as-yet undeveloped policies within 1-2 years. Simply developing the new policies (and securing approvals) is likely to take the full allotted time. There is unlikely to be sufficient time for EAP to then update its own procedures to begin implementing the new policy within the committed timeframes. This can be mitigated by ensuring that EAP is aware of the content or direction of the new policies, and by EAP working in parallel to update its procedures. The risk is that if any changes are required to the policy when it goes through the approvals process, time may have been wasted in updating EAP procedures before the new policy was approved.
Resources	A small project team comprising EL 1 Manager and 1 x APS6 has been

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Constraint	Explanation of the constraints' influence on the project
	mobilised. Another APS6 position is identified for the project team, although backfilling arrangements have been unsuccessful to date. This team is able to guide and drive the project, however relies on the cooperation and assistance of others across the agency. Should additional resources be required, these will be identified to the Project Sponsor at the earliest opportunity.
Emerging issues	Throughout the year, permittees or applicants raise with senior management other permit-related issues which may take precedence over some tasks in this project plan. There may be a requirement to divert resources from this project or to re-evaluate the project to respond to these emerging issues.

Assumptions

The following assumptions are currently being made:

- This is a priority project for GBRMPA which will be supported by senior management, including the provision of additional resources if justified.
- In the current regulatory and political environment, the GBRMP Regulations can be amended.
- Other teams will communicate clearly and openly with the project team regarding aligned activities.
- Aligned projects will be delivered on time.
- Coordination of all aligned projects will be considered for a standard implementation date of 1 July 2017 (Phase One) and 1 July 2020 (Phase Two).

Dependencies

The table below summarises aligned projects with indicative timeframes for completion. All project managers were invited to provide comments on this project plan prior to Version 1 finalisation. The final column in the table shows which project managers provided comments. Projects that did not comment may need extra consideration as their project develop to ensure coordination of effort and outputs. The Department of the Environment was also invited to comment but did not make any comments.

Table 3: Key dependencies Aligned Projects (only those directly relevant to the permission system)

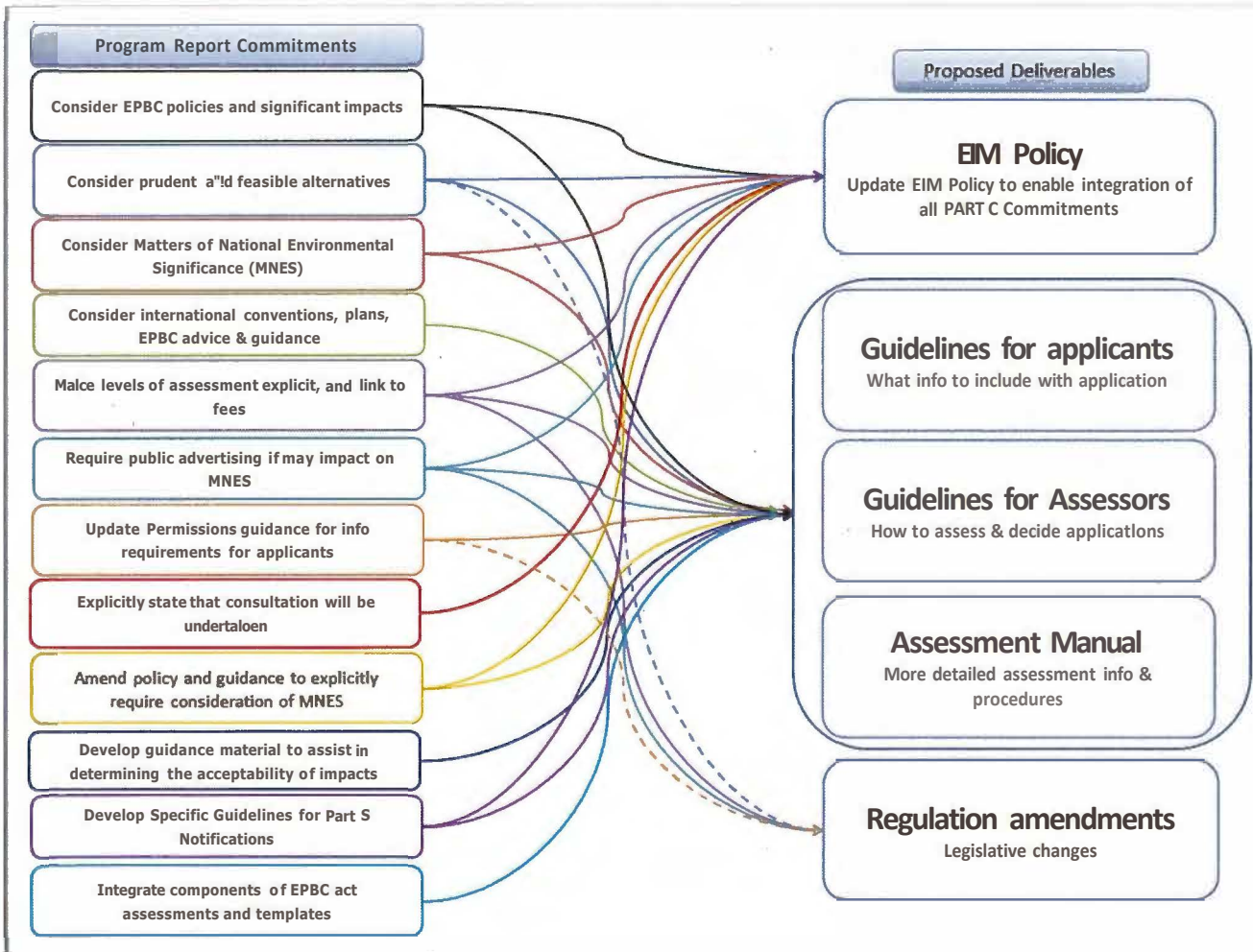
Project	Lead (project manager)	Publicly committed timeframe for completion	Commented on this project plan?
Bold - Program Report commitment <i>Italics - AOP commitment</i>			
Cumulative Impact Assessment Guidelines	Reef 2050 (Hayley Gorsuch)	31-Aug-15	Yes
Net Benefit & Offsets Policy	Reef 2050 (Jason Vains)	31-Aug-15	Yes
Heritage Strategy	Reef 2050 (Chloe Schauble)	31-Aug-16	Yes
Underwater Noise Guidelines	Reef Recovery (?)	31-Aug-16	No
Water Quality Guidelines	Reef Recovery (?)	31-Aug-16	No
Indigenous Management Framework	Indigenous Partnerships (?)	31-Aug-19	No
Reef Integrated Monitoring & Reporting Program	Reef 2050 (Fergus Molloy)	31-Aug-19	No
Permission System Compliance Plan	EAP (Mel Cowlshaw)	31-Aug-19	Yes
Ecosystem Standards & Thresholds	Reef Recovery (David Wachenfeld)	31-Aug-19	No
Social & Economic Long-Term Monitoring Program	Reef 2050 (Margaret Gooch)	31-Aug-19	Yes
All POM reviews	GBRO (Sally Harman)	31-Aug-19	No
<i>Single GBR Permit</i>	EAP (Mel Cowlshaw)	N/A	Yes
<i>Reef Management System</i>	IMSaT (David Leverton)	N/A	Yes

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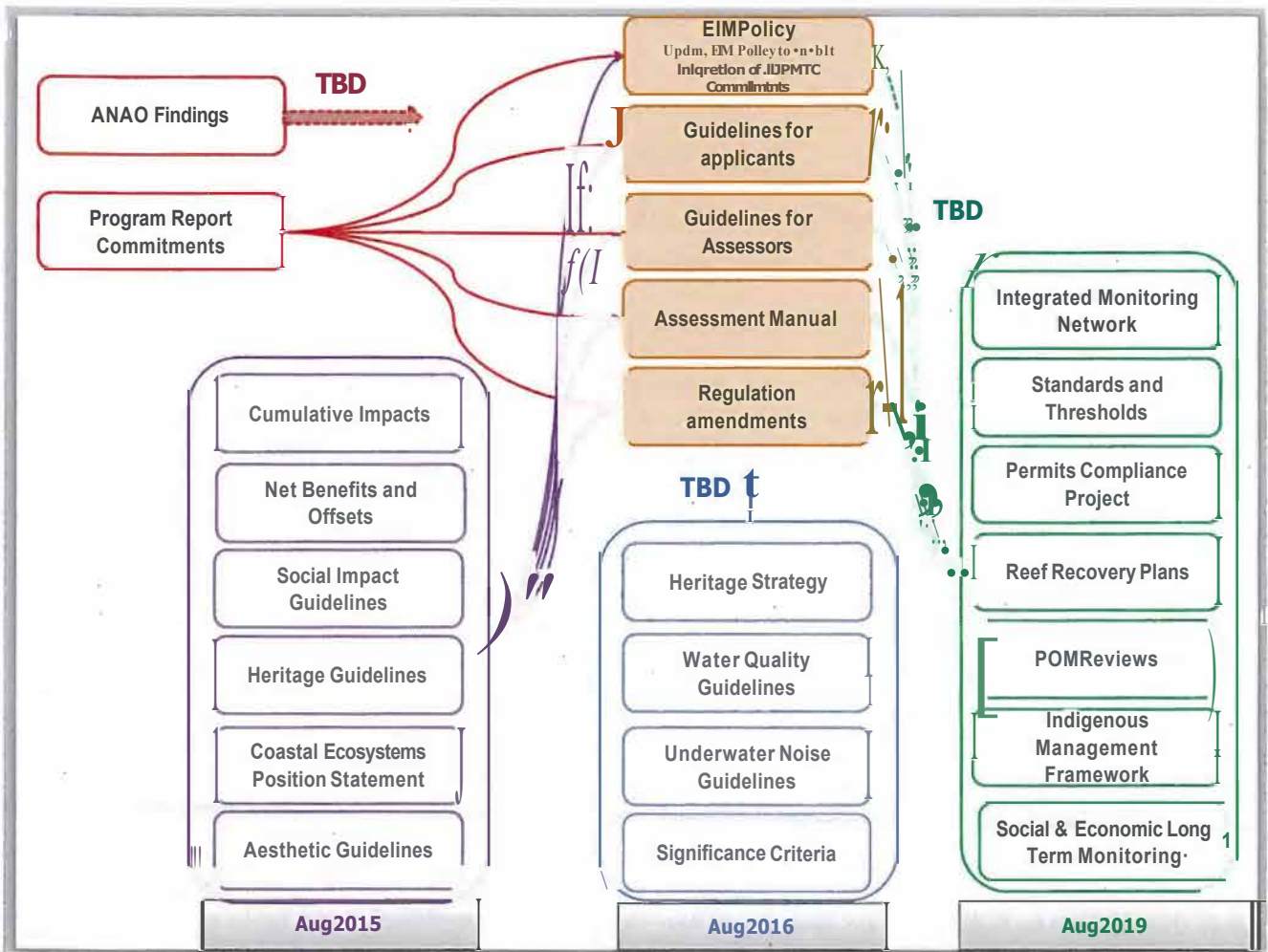
Project <i>Bold - Program Report commitment</i> <i>Italics - AOP commitment</i>	Lead (project manager)	Publicly committed timeframe for completion	Commented on this project plan?
<i>Social Impact Assessment Guidelines</i>	Reef 2050 (Margaret Gooch)	N/A	Yes
<i>Aesthetic Guidelines</i>	Reef 2050 (Margaret Gooch)	N/A	Yes
<i>Coastal Ecosystems Position Statement</i>	Reef Recovery (?)	N/A	No
<i>Biodiversity Vulnerability Assessments</i>	Reef Recovery {?}	N/A	No
<i>Heritage assessment & management guidelines</i>	Reef 2050 (Chloe Schauble)	N/A	Yes
<i>Commonwealth Island management plans</i>	GBRO (Steph Lemm)	N/A	No
<i>Lady Musgrave Island Site Management Arrangements review</i>	GBRO (Steph Lemm)	N/A	No
<i>Tourism Management Strategy</i>	Tourism & Stewardship (Vicki Bonnano)	N/A	No
<i>Cruise Ship Policy review</i>	Tourism & Stewardship (Vicki Bonnano)	N/A	No

Program Logic and Dependency Diagrams

The following diagrams illustrate the program logic and some key dependencies.



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Time (schedule)

The work breakdown structure / detailed project schedule for Phase One (Jan 2015 to July 2017) of this project is located at **Attachment B**. Phase Two (July 2017 to Jan 2020) has not yet been scoped. Timings for seeking the Minister's approval have been tentatively programmed into the project for between March to June 2016 (following Round 1 consultation), subject to formal agreement with the Department.

Key indicative milestones for Phase One (Jan 2015 to July 2017) are shown graphically on the following pages.

These timelines were updated in September 2015 to reflect OBPR's decision that no RIS was required.

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ASSESSMENT & DECISION ENHANCEMENT PROJECT - No RIS												
	Internal project work	External consultation	MPA Board meetings	Minister								
2015												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Core project tasks	Project scoping			Project Pillar 1 developed (Willow ANAO findings)	Incorporate ANAO findings & finalise Project Plan	Develop Consultation Document. Start drafting policy & guidelines.			Consultation Round 1: Introduce goals, seek suggestions for improvements, feedback on potential Regulations amendments			
Major external events						MPA - Project overview			MPA - Approval to consult			MPA - Project update (optional)
2016												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Core project tasks	Consultation summary & responses	Draft Minister's brief, finalise draft EM Policy.	Start Reg amendments process	Finalise draft policy & guidelines. Continue with Reg amendments processes.				Consultation Round 2: Draft Policy & Guidelines	Continue with Resilience Processes. Finalise Policy & Guidelines.			
Major external events			MPA - Consultation summary	Minister's in-principle approval for Reg amendments		MPA - Approval to consult					MPA - Consultation summary	
2017												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Core project tasks	Final formation of tools & webpages. Update business procedures, templates & class assessments.			Internal training		External info campaign	Implementation					
Major external events		Submit Reg amendments to ExCo	MPA - Approval of final policy			MPA - Project update (optional)						

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Project funding

Project budget overview

The project has been scoped in detail for Phase One (January 2015 to July 2017). Notional amounts are shown for out years, to be firmed up as Phase Two (July 2017 to January 2020) as scoped.

Table 3: Overview of project budget

Source	Total	Expenses 2014-15	Expenses 2015-16	Expenses 2016-17	Expenses 2017-18	Expenses 2018-19	Expenses 2019-20
					<i>NOTIONAL - (not yet scoped)</i>		
Depart'	\$ 210 000	\$ 40 000	\$ 120 000	\$ 80 000	\$ 20 000	\$20 000	\$20 000
Admin	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
Capital	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
Total	\$ 300 000	\$ 40 000	\$ 120 000	\$ 80 000	\$ 20 000	\$ 20 000	\$ 20 000

Key expenses in Phase One are:

- \$10k per year: Staff travel for meetings with Dept of Enviro and other stakeholders
- \$10K in 2015-16: Contractor for "Risk Management Framework" package - See Contract Management section for details.
- \$40k in 2015-16: Contractor for "Risk Management Tools" package - See Contract Management section for details.
- \$40k in 2015-16: Contractor for "Managing Fixed Facilities" package - See Contract Management section for details.
- \$50k in 2016-17: Contractor to assist with final website formatting - See Contract Management section for details.
- \$5k in 2016-17: Staff travel and venue hire for stakeholder information campaign prior to implementation
- \$5k in 2016-17: Printing, scanning, burning CDs, etc.

Resourcing requirements

The following internal EAP resources are required:

Table 4: Internal resource requirements

Resources	Estimated effort(% of time)			Nominated resource
	Implement phase	Finalise phase	Post project	
Project Director - EL2 Director (EAP)	20%	20%	10%	Kirstin Dobbs
Project Manager - EL 1 Manager (Strategy Development)	60%	60%	20%	Rachel Reese
Project Team Member-APS6 Senior Policy Officer	70%	70%	10%	Kimberly Glover (A/ Tina Alderson)
Project Team Member -APS6 Senior Policy Officer	70%	70%	10%	Anna Dowd / Emily Smart
Project input (various officers) - PSS	5%	5%	10%	Various officers
Project input (various officers) -A&P	5%	5%	10%	Various officers

The following resources outside EAP are required:

Table 5: Table of external resource requirements

Resources	Estimated days/ cost			Nominated resource
	Implement phase	Finalise phase	Post project	
Project Sponsor - GM BCSU	5%	10%	5%	Bruce Elliot

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Resources	Estimated days/ cost			Nominated resource
Project input - Reef 2050	10%	10%	5%	Various officers
Project input - Reef Recovery	5%	5%	5%	Various officers
Project input- QPWS	10%	10%	5%	Various officers (through JPWG)
Project input - T&S	5%	5%	5%	Various officers
Legal Services	20%	20%	5%	For Reg amendments

Governance

Roles and responsibilities

Project role	Assignee
Project sponsor	Bruce Elliot, GM BCSU
Project director	Kirstin Dobbs, Director EAP
Project manager	Rachel Reese, Manager of Strategy Development, EAP

Table 6: Project governance roles

Governance structures

Structure	Chair
Steering committee - TBD - Ideally addressed through SMF	Kirstin Dobbs, Director EAP
Working group - TBD - Ideally addressed through existing working groups	Rachel Reese, Manager of Strategy Development, EAP

Table 7: Project governance structures

Minor changes to scope (<10% change to milestones or resourcing) are approved by the Project Manager.

Moderate changes to scope (10-30% change to milestones or resourcing) are approved by the Project Director.

Major changes to scope (>30% change to milestones or resourcing) are approved by the Project Sponsor.

Scope changes are recorded in **Attachment E**

Stakeholder management and communication plan

The [Stakeholder Management and Communication Plan](#) for this project is summarised below. Refer to the full plan for details (for example, which industry peak bodies will be consulted).

Stakeholder	How could this stakeholder...		What information	Method of Communication	When/how often?	Who is responsible
	Impact the project	Impacted by the project				
Dept of Environment	Approval required	Staff time required	Status updates	Face to face, email	Monthly	Project manager
QPWS	Provide valuable input. Support or oppose changes.	Joint permits	Consult on changes to Regs, policies & guidelines. Advise of changes to procedures.	Face to face, email	Joint Permit Working Group-standing agenda item	Project manager
Applicants & permittees (individual)	Provide valuable input. Support or oppose changes.	Changes to how GBRMPA does business with them	Consult on changes to Regs, policies & guidelines. Advise of changes to procedures.	Face to face, email, website	At key milestones or identified consultation stages	Project manager

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Stakeholder	Impact the project	Impacted by the project	Information	Method of Communication	Frequency	Responsible	
Reef Advisory Committees (Tourism, Indigenous)	Provide valuable input. Support or oppose changes.	Changes to how GBRMPA does business with their constituents	Consult on changes to policies & guidelines.	Regs,	Regular agenda item update	Quarterly	Project director
Local Marine Advisory Committees	Provide valuable input. Support or oppose changes.	Changes to how GBRMPA does business with their constituents	Consult on changes to policies & guidelines.	Regs,	Regular agenda item update	Quarterly	Project director
Peak industry bodies	Provide valuable input. Support or oppose changes.	Changes to how GBRMPA does business with their constituents	Consult on changes to policies & guidelines.	Regs,	Targeted & general consultation	As per project plan	Project director
General public	Provide valuable input. Support or oppose changes.	Changes to how the MP is managed	Consult on changes to policies & guidelines.	Regs,	General consultation	As per project plan	Project manager

Quality of outputs

A [full list of outputs](#) is available on The Dock. The below table summarises broad packages of outputs.

Table 8: Table of output requirements

Output	Highest level requirement
EIM Policy - revised	MPA Board endorsement
Structures Policy - revoked (incorporated into revised EIM Policy & new guidelines)	MPA Board endorsement
Preliminary response to ANAO findings	GM approval
GBRMP Regulations - amended, including but not limited to: <ul style="list-style-type: none"> a. Fees for EPBC assessments b. Advertisement of applications that may significantly impact on MNES 	MPA Board, Minister & Executive Council
Guidelines for Part 5 Notifications (considering MNES) - new	DOE endorsement GM approval
Guidelines for applicants and assessors - new, including: <ul style="list-style-type: none"> a. Assessment levels & information required for each level (linked to new permit application form) b. Public notice, advertisement and consultation on proposals c. Acceptability of impacts on MNES 	DOE, QPWS & relevant GBRMPA sections endorsement GM approval

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Output	Highest level requirement
d. Consideration of impacts of underwater noise	
Assessment Manual with detailed tools & procedures - new	DOE, QPWS & relevant GBRMPA sections endorsement GM approval
Standard class assessments - revised	Director approval
Implementation Plan for actions beyond 2020 (that aren't already covered in Program Report commitments) - new	GM approval

Contract management

Phase One identifies the need for four (4) contracts which will be managed by the Project Manager. These contracts are:

1. Risk Management Framework
 - o Time: Nov 2015 - Jun 2016
 - o Budget: \$10,000
 - o Scope: Creating a matrix of which activities impact on which values, rolling up the individual value risk tables into overall risk tables, ensuring consistency with GBRMPA and international risk management standards.
2. Risk Management Tools
 - o Time: Nov 2015 - Jun 2016
 - o Budget: \$40,000
 - o Scope: Discussion and options paper about when various tools should be used as permit condition,; for example - insurance, indemnities, deeds, bonds, environmental management plans, vessel identification number plaques, vessel notification approvals, facility notification approvals, mooring notification approvals.
3. Managing Fixed Facilities
 - o Time: Nov 2015 - Jun 2016
 - o Budget: \$40,000
 - o Scope: Discussion and options paper about best ways to manage fixed facilities; for example - frequency of inspections, qualifications of inspector, decommissioning, removal.
4. Website formatting
 - o Time: May-July 2017
 - o Budget: \$50,000
 - o Scope: Format nested Risk Mgmt Framework tables, final documents, final webpages, etc
 - o *NOTE: This work may be supplanted by improvements being scoped for RMS.*

As Phase Two is scoped, some additional contracts may be required. The project plan will be updated in future should this become necessary. Contracts may also be contemplated if internal resources are not sufficient to meet desired timeframes.

Project risk and issue management

Risk management

The Risk Assessment and Treatment Plan for this project is located at **Attachment C**.

Issue/incident management

The Issues Register for this project is located at **Attachment D**.

Consequences of project not gaining approval

- Failure to deliver on GBRMPA's commitments in the Program Report.

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- Failure to respond to ANAO recommendations.
- Failure to implement LTSP actions.
- Increased risk of environmental harm occurring due to permission system not being enhanced.

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Attachment A - Outcome realisation measurement criteria

Table 9: Outcome realisation measurement criteria

Ref	Project outcome	Performance indicator	Data	Baseline indicator result	Target indicator result	Completion date	Accountability
1	Provide applicants and other stakeholders with a clear understanding of how permit decisions are made and the information needed by the delegate to make a decision	Decrease in number and/or complexity of Further Information requests (FINFOs). Applicants report that they have better guidance available from GBRMPA.	RMS - number of FINFOs issued EAP survey (NEW) - Complexity of FINFOs issued Stakeholder annual survey (NEW)	TBD - Waiting statistics from RMS EAP & Stakeholder surveys - No baseline data available.	FINFOs reduce by 20% in the first year after implementation. 75% of EAP staff indicate that FINFOs have reduced in complexity in the first year after implementation. 60% of applicants indicate that they have better guidance.	1 Jul 2017 (1 Jul 2018 to test indicators)	Manager, Assessments & Permissions (EAP)
2	Provide GBRMPA with a means of implementing the Program Report's recommendation for GBRMPA to make decisions under EPBC Act for those matters wholly within the GBRMP	Minister approves GBRMPA for classes of actions under EPBC Act. EAP staff report that they have better tools and guidance for assessing permit applications.	Ministerial decision EAP survey (NEW)	No Ministerial decision. No quantitative baseline data. Consider running EAP survey in Feb 2015.	Ministerial approval. 75% of EAP staff indicate that tools and guidance have improved.	1 Jul 2017 (1 Jul 2018 to test indicators)	Director, EAP
3	GBRMPA has a plan that will enable all ANAO and LTSP recommendations to be completed within the specified timeframes (for future actions beyond 2020)	Implementation Plan for responding to ANAO findings & LTSP is endorsed and resources are allocated.	GM decision Audit Committee meeting minutes / reports	No project plan or specific resourcing exists.	Plan approved by GM and implementation is resourced	15 Jan 2020	Director, EAP

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ATTACHMENT B-WORK BREAKDOWN STRUCTURE

The Work Breakdown Structure is constantly under refinement in Microsoft Project, which cannot be uploaded onto The Dock. A screenshot of the latest version (19 October 2015) is below. NOTE no changes have yet been made to this schedule to reflect 3 contracts. These updates will be made once contractors are engaged and have presented their proposed milestones.

Task No.	Description	Duration	Start	Finish	PreM<Hsors	Completion	Home
0	Program Plan	667 days	Fri 2/01/15	Mon 24/07/17		38%	
1	SCOPING	31 days	Fri 2/01/15	Fri 13/02/15		100%	
2	Meet with DCE and re-view StraAss commitments, Acnt+ responsibilities and deliverables.	20 days	Mon 19/01/15	Fri 13/02/15		100%	
3	Collate all relevant EPBC documents (plans, policies, guidelines etc)	21 days	Fri 13/02/15			100%	DCE list provided 23 Mar 15
4	Meet P S S ... rol11& respGisibilities.	2days	Wed 21/01/15	Tue 22/01/15		100%	
5	MtH will Reef 2050 and agree roles & responsibilities.	5days	Mon 19/01/15	Fri 23/01/15		100%	
6	Meet - Reef Recovery and agree roles & responsibilities, particularly for underwater Noise Guidelines and regionalised ecosystem health Incl.-S.	1 day	Tue 22/01/15	Tue 22/01/15		100%	Initial meeting completed, requires ongoing follow-up
7	Project plan alignment project to identify 1YfergIH & llers.Agrw EPA role h for-projecta.	15days	Mon 11/01/15			100%	
8	Integrated Monitoring & Reporting OIRep)- Fergus	1 day	Mon 19/01/15	Mon 19/01/15		100%	Initial meeting completed, requires ongoing follow-up
9	Cumulative Assessment- Hayley Gosdnt	1 day	Mon 19/01/15	Mon 19/01/15		100%	
10	Net Benefit Policy- Jason Vains	1 day	Mon 19/01/15	Mon 19/01/15		100%	
11	Standards & Thresholds - Reef R...ry	1 day	Mon 19/01/15	Mon 19/01/15		100%	Initial meeting but too early-follow up later
12	Heritage Strategy - Chloe Sch-auble-Hary Seat	1 day	Mon 19/01/15	Mon 19/01/15		100%	
13	Indigenous Heritage Strategy	1 day	Mon 19/01/15	Mon 19/01/15		100%	Initial meeting but too early. follow up later
14	Community Benefits - Margaret Goodl	1 day	Tue 2/2/15			100%	
15	Outsharing C-e-COtnmons-O...-r1Dn	1 day	Thu 12/03/15			100%	Initial meeting held-continue to liaise
16	Project plan for B.M. &	93days	Fri 2/01/15	Tue 12/5/15		100%	
17	Ref. & incorporate feedback team EN on proposed deliverables	1 day	Mon 23/02/15	Tue 12/03/15	7	100%	Workshop 25 Feb with final comments due 11 Mar
18	Finalise partial project plan (all except ANAC)	28 days	Fri 27/02/15	Tue 7/04/15	17	100%	
19	Endorsement Com Director for partial project plan	5 days	Wed 8/04/15	Tue 1/04/15	18	100%	
20	GU endorsement of partial project plan	10 days	Wed 15/04/15	Tue 28/04/15	19	100%	

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21	Review ANSC Board Paper & identify actions	10 days	Mon 4/05/15			100%	Issues Paper, may be delayed past Easter
22	Feedback on identified modifications -EAP, LSU?	7 days	Mon 18/05/15	Tue 28/05/15	21	100%	
23	Incorporate modifications into draft plan	7 days	Wed 27/05/15	Thu 4/06/15	22	100%	
24	Director endorsement of updated project plan	7 days	Fri 5/06/15	Mon 15/06/15	23	100%	No updates required
25	Gil endorsement of updated Project Plan	14 days	Tue 16/06/15	Fri 3/07/15	24	100%	No updates required
26	Prepare & submit IIPA Board paper outlining OY (a) (a) and timelines	20 days	Wed 29/04/15	Tue 28/05/15	20	100%	
27	IIPA Board meeting & Director's Office	7 days	Wed 15/07/15	Thu 23/07/15		100%	Delayed from June to July
28		15 days	Fri 18/07/15	Tue 23/08/15		100%	
29	Draft & finalise communications plan	15 days	Wed 15/07/15	Tue 4/08/15	171	100%	
30	Prepare IIPA Board paper seeking approval to consult Round 1	10 days	Mon 4/01/16	Fri 11/01/16	171	100%	
31	Director approval of IIPA Board paper	5 days	Mon 3/08/15	Fri 7/08/15		100%	
32	Gil - - all IIPA Board -	5 days	Mon 10/08/15	Fri 14/08/15	31	100%	
33	Sept 2015 IIPA Board meeting - Approval to consult Round 1	10 days	Mon 14/09/15	Fri 25/09/15		100%	Fixed date
34	Draft Consultation Document	25 days	Wed 15/07/15	Tue 18/08/15	171	100%	
35	Develop costings with DCE DeReg	25 days	Wed 15/07/15	Tue 18/08/15	171	100%	
36	EN' and T&S feedback on Draft consultation Document	10 days	Wed 19/08/15	Tue 1/09/15	34	100%	
37	Director approval of Draft consultation Document	5 days	Wed 2/09/15	Tue 8/09/15	36	100%	
38	Broader GBRMPA & CPWS feedback on Draft consultation Document	10 days	Wed 9/09/15	Tue 22/09/15	37	100%	
39	Gil - - all final decisions on Document & Plan	4 days	Wed 23/09/15	Mon 28/09/15	38,37	100%	
40	Graphics on Consultation Document	7 days	Tue 29/09/15	Wed 7/10/15	39	100%	
41	Prepare materials (Website led, email templates, etc)	30 days	Wed 19/08/15	Tue 29/09/15	171,37	100%	
42	Organise workshop & internal seminar logbooks	20 days	Wed 2/09/15	Tue 29/09/15	29,36	75%	
43	Director approval of Comms Plan & final materials	5 days	Thu 8/10/15	Wed 14/10/15	41,40	100%	
44	Minister approval of consultation brief	15 days	Tue 29/09/15	Mon 19/10/15	39	100%	

Task Name	Duration	Start	Finish	Predecessors	Complete	Notes
CONSULTATION - ROUND 1		Fri 18/07/15			21%	
Ellemt consultation period	44 days	Tue 20/10/15	Fri 18/12/15	43,44	5%	
Internal consultation sessions	40 days	Wed 9/09/15	Tue 3/11/15	37	50%	
Consultation SURMIB' & proposed responses	20 days	Mon 21/12/15	Fri 15/01/16	46	0%	
DEVELOP DRAFT POLICY & GUIDELINES		Fri 18/07/15			51%	
8 EM Policy		Fri 18/11/15				
Prepare 1st draft	40 days	Mon 16/03/15	Fri 8/05/15	17	100%	
Feedback on 1st draft	27 days	Mon 11/05/15	Tue 16/06/15	51	100%	
Prepare 2nd draft	20 days	Wed 17/06/15	Tue 14/07/15	52	100%	
Feedback on 2nd draft	10 days	Wed 15/07/15	Tue 28/07/15	53	100%	
Prepare 3rd draft	10 days	Wed 29/07/15	Tue 11/08/15	54	100%	
Feedback on 3rd draft-EN', GBRMPA, CPWS	30 days	Wed 12/08/15	Tue 22/09/15	55	100%	
Prepare 4th draft	15 days	Wed 23/09/15	Tue 13/10/15	56	25%	
Update based on Round 1 consultation	10 days	Mon 18/01/16	Fri 29/01/16	48	0%	
Feedback on 4th draft-EN', GBRMPA, CPWS	10 days	Mon 1/02/16	Fri 12/02/16	58	0%	
Director approval	10 days	Mon 15/02/16	Fri 26/02/16	59	0%	
E Guidelines for Applications	193 days	Wed 17/06/15	Fri 11/03/16			
Prepare 1st draft	70 days	Wed 17/06/15	Tue 22/09/15	17,52	75%	
Feedback on 1st draft	20 days	Wed 23/09/15	Tue 20/10/15	56	0%	
Prepare 2nd draft including outcomes from Round 1 consultation	10 days	Mon 18/01/16	Fri 29/01/16	63,48	0%	
Feedback on 2nd draft	20 days	Mon 1/02/16	Fri 26/02/16	64	0%	
Prepare 3rd draft	5 days	Mon 29/02/16	Fri 4/03/16	65	0%	
Director approval	5 days	Mon 7/03/16	Fri 11/03/16	66	0%	
B Guidelines for Assessments - Part 1	1 day	Fri 16/11/15	Fri 16/11/15		85%	
Compare GBRMPA deliverables against EPBC documents and identify where each EPBC document would be applied.	20 days	Tue 7/04/15			100%	
Prepare 1st draft -Assessment Criteria	90 days	Fri 13/03/15	Thu 16/07/15	17	100%	
Feedback on 1st draft- Assessment Criteria	32 days	Fri 17/07/15	Mon 31/08/15	70	100%	
Prepare 2nd draft-All sections - Including outcomes from Round 1 consultation	20 days	Mon 15/02/16	Fri 11/03/16	59,48	25%	
Feedback on 2nd draft-All sections	30 days	Mon 14/03/16	Fri 22/04/16	72	0%	
Prepare 3rd draft (after policy)	15 days	Mon 25/04/16	Fri 13/05/16	73,48,60	0%	

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76	8 Guidelines for Assessment - Part 2	341 days	Fri 16/01/15	Fri 6/05/16		
77	8 Vun, category sections and Risk	250 days	Tue 17/03/15	Mon 29/02/16		
78	Draft value framework for other teams to complete	20 days	Tue 17/03/15	Mon 13/04/15	17	100%
79	EN feedback on value framework	11 days	Mon 20/04/15	Mon 4/05/15	78	100%
80	Finalise value framework for other teams	5 days	Tue 5/05/15	Mon 11/05/15	79	100%
81	Meet with other teams to explain value framework & request completion	40 days	Tue 12/05/15	Mon 6/07/15	80	100%
82	Receive value framework feedback from other teams - meet, discuss, redraft with their input	90 days	Tue 7/07/15	Mon 9/11/15	81	25%
83	Analyse value category sections & risk tables and seek teams' review	60 days	Tue 10/11/15	Mon 1/02/16	82	0%
84	Incorporate teams' feedback and finalise value assessment guidelines	20 days	Tue 2/02/16	Mon 29/02/16	83	0%
85	8 Activity sections	191.3 days	Fri 16/01/15	Mon 12/10/15		20%
86	Prepare 1st draft - example format	15 days	Wed 15/07/15	Tue 4/08/15	53	100%
87	Feedback on 1st draft - example format	25 days	Wed 5/08/15	Tue 8/09/15	86	100%
88	Prepare 2nd draft - priority activities	100 days	Wed 9/09/15	Tue 26/01/16	87	0%
89	Feedback on 2nd draft - priority activities	40 days	Wed 27/01/16	Tue 22/03/16	88	0%
90	Finalise activity sections	20 days	Wed 23/03/16	Tue 19/04/16	89,90	0%
91	8 Location sections	299 days	Tue 17/03/15	Fri 6/05/16		67%
92	Prepare 1st draft	100 days	Tue 17/03/15	Mon 3/08/15	17	100%
93	Feedback on 1st draft	20 days	Mon 29/02/16	Fri 25/03/16	92,87,85	0%
94	Prepare 2nd draft	10 days	Mon 28/03/16	Fri 8/04/16	93,90	0%
95	Feedback on 2nd draft	15 days	Mon 11/04/16	Fri 29/04/16	94	0%
96	Finalise location sections	5 days	Mon 2/05/16	Fri 6/05/16	95	0%
97	- Prepare for Round 2 consultation					0%
98	Prepare overall final consultation package	38 days	Mon 3/05/16	Wed 11/11/15		0%
99	Drafting & consolidating	5 days	Mon 3/05/16	Fri 3/08/16	67,84,96,75	0%
100	Manager review	1 day	Mon 6/06/16	Wed 8/06/16	99	0%
101	Feedback on 1st draft package	15 days	Thu 9/06/16	Wed 29/06/16	100	0%

Task Name	Duration	Start	Finish	Predecessor	Notes
102 Prepare 2nd draft package	5 days	Tue 30/08/16	Wed 6/07/16	101	
105 Feedback on 2nd draft package	10 days	Thu 7/07/16	Wed 20/07/16	102	0%
104 Prepare MPA Board paper seeking approval to CERGL	5 days	Mon 25/04/16	Fri 29/04/16	60,65,73	0%
105 Director approval of MPA Board paper	5 days	Mon 2/05/16	Fri 6/05/16	104	0%
106 CIL approval of MPA Board paper	5 days	Mon 9/05/16	Fri 13/05/16	105	0%
107 June 2016 MPA Board meeting - Approval to consult on policy & website updates	7 days	Mon 13/06/16	Tue 21/06/16		Off. Filed date
108 Prepare 3rd draft package	5 days	Thu 21/07/16	Wed 27/07/16	103	0%
109 Prepare & submit CIL brief & MPA brief	5 days	Thu 28/07/16	Wed 3/08/16	108,107	0%
110 Director approval	5 days	Thu 4/08/16	Wed 10/08/16	109	0%
111 CIL approval	5 days	Thu 11/08/16	Wed 17/08/16	110	0%
112 Minister approval to consult	15 days	Thu 18/08/16	Wed 7/09/16	111	0%
113 Analyse comments materials, logsheets & website updates	5 days	Thu 11/08/16	Wed 17/08/16	110,107,33	0%
114 CONSULT ON DRAFT GUIDELINES & POLICY	78 days	Thu 18/08/16	Wed 23/11/16		0%
115 CIL approval period	SOA...	Thu 18/08/16	Wed 23/11/16	113	0%
116 Writal Consultation Conditions	50 days	Tue 18/08/16	Wed 26/10/16	111	0%
117 Consultation summary & proposed responses	20 days	Thu 27/10/16	Wed 23/11/16	115	0%
118 FINALISE POLICY	84 days	Thu 24/11/16	Tue 4/04/17		0%
119 Re-draft	20 days	Thu 24/11/16	Wed 21/12/16	117	0%
120 Feedback on re-draft	30 days	Thu 22/12/16	Wed 10/01/17	119	0%
121 Re-draft	5 days	Thu 20/01/17	Wed 28/02/17	120	0%
122 Prepare MPA Board paper seeking approval of Policy	10 days	Tue 22/12/16	Wed 4/01/17	119	0%
123 Director approval of MPA Board paper & Policy	5 days	Thu 5/01/17	Wed 11/01/17	122	0%
124 CIL approval of MPA Board paper & Policy	10 days	Thu 9/02/17	Wed 22/02/17	123,121	0%
125 March 2017 MPA Board meeting Approval of final Policy	7 days	Mon 13/03/17	Tue 21/03/17		Off. Filed date
126 Finalise Policy	10 days	Wed 22/03/17	Tue 4/04/17	125	0%
127 SEEK COMMENTS FROM STAKEHOLDERS FOR COURSE OF ACTIONS	110 days	11/01/17	11/01/17		0%
128 Comments from stakeholders have been adequately completed	5 days	Mon 11/01/17	Fri 4/12/15	5,33	0%
129 Oral Ministerial brief (or letter from Chair of Minister) seeking approval and submit	5 days	Mon 28/03/16	Fri 10/4/16	215	0%

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110	Director approval of brief/letter	5 days	Mon 4/04/16	Fri 8/04/16	129		0%
131	GM approval of brief/letter	10 days	Mon 11/04/16	Fri 22/04/16	130		0%
132	Chairman approval of brief/letter	15 days	Mon 25/04/16	Fri 13/05/16	131		0%
155	Minister approval	40 days	Mon 16/05/16	Fri 8/07/16	132		0%
154	Develop communications strategy	10 days	Mon 16/05/16	Fri 27/05/16	132		0%
135	Implement communications strategy - website updates, m&db releases, etc	10 days	Mon 11/07/16	Fri 22/07/16	133		0%
Guidelines for Assessments							
137	Guidelines for Assessments	95 days	Thu 24/11/16	Wed 5/04/17			0%
138	Re-draft	20 days	Thu 24/11/16	Wed 21/12/16	117		0%
139	Feedback on re-draft	30 days	Thu 22/12/16	Wed 10/2/17	138		0%
140	Finalise	30 days	Thu 23/02/17	Wed 5/04/17	139,124		0%
141	E Guidelines for Assessments	90 days	Thu 24/11/16	Wed 29/03/17	115		0%
142	Re-draft	30 days	Thu 24/11/16	Wed 4/01/17	117		0%
143	Feedback on re-draft	40 days	Thu 5/01/17	Wed 10/3/17	142		0%
144	Finalise	20 days	Thu 2/03/17	Wed 29/03/17	143,124		0%
145	EN' consultation: Formatting & presentation	223 days	Thu 18/08/16	Mon 26/06/17			0%
146	Prepare consultant brief	15 days	Thu 18/08/16	Wed 7/09/16	111		0%
147	Procurement	50 days	Thu 8/09/16	Wed 16/11/16	146		0%
148	Inception meeting & provide materials to consultant	10 days	Thu 2/03/17	Wed 15/03/17	143,147		0%
149	Consultant prepares 1st draft	20 days	Thu 16/03/17	Wed 12/04/17	148		0%
150	Project team comment on 1st draft	20 days	Thu 13/04/17	Wed 10/05/17	149		0%
151	Consultant prepares 2nd draft	10 days	Thu 11/05/17	Wed 24/05/17	150,239		0%
152	EN' consultation on 2nd draft	10 days	Thu 25/05/17	Wed 7/06/17	151		0%
153	Project team comment on 2nd draft	3 days	Thu 8/06/17	Mon 12/06/17	152		0%
154	Consultant submits final outputs	10 days	Tue 13/06/17	Mon 28/06/17	153		0%
EN' Drafting Phase							
156	Seek GBRMPA input on suggested R1 gameplan	27 days	Thu 12/02/15	Fri 20/03/15			100%
157	Filter suggestions with EN' & LSU, discuss with other teams	25 days	Mon 23/03/15	Fri 24/04/15	158		100%, May need 2-part filtering - 1st Internal, 2nd - H11
158	Drafting Phase	25 days	Mon 27/11/15	Fri 29/05/15			100%
159	Draft Reg overview & present to BMC	21 days	Mon 27/04/15	Mon 25/05/15	157		100%
160	ENIG -- (through M.P.) to Regs amendment	5 days	Mon 25/05/15	Fri 29/05/15			100%, Approved Sep 2015 MPA

Task Name	Duration	Start	Finish	Predecessors	% Complete	Notes
161	RIS Preliminary Assessment	1 day	Fri 2/10/15	Fri 2/10/15		100%
162	Work through RIS Steps 1-3 (Problem. Neel. Options)	20 Clays	Mon 4/05/15	Fri 29/05/15		100%
163	Seek feedback from working group on RIS steps 1-3 & Incorporate	20 Clays	Mon 1/06/15	Fri 26/06/15	162	100%
164	Seek feedback from DOE DeReg on RIS Steps 1-3 & Incorporate	6 Clays	Mon 1/06/15	Mon 8/06/15		100%
165	Prepare RIS Preliminary Assessment	3 Clays	Mon 8/06/15	Wed 10/06/15	164	100%
166	Seek feedback from working group on RIS Preliminary Assessment & Incorporate	3 Clays	Mon 8/06/15	Wed 10/06/15	164	100%
167	Director approval of RIS Preliminary Assessment	2 Clays	Thu 11/06/15	Fri 12/06/15	165	100%
168	Seek DOE DeReg feedback on RIS Preliminary Assessment & incorporate	5 Clays	Mon 15/06/15	Fri 19/06/15	167	100%
169	In-principle GM approval of RIS Preliminary Assessment	5 Clays	Mon 22/06/15	Fri 26/06/15	168	100%
170	Final GM approval and forward RIS Preliminary Assessment to DOE	2 Clays	Mon 29/06/15	Tue 30/06/15	169	100%
171	Receive feedback from OBPR & incorporate	10 Clays	Wed 1/07/15	Tue 14/07/15	170	100%

NOTE - RIS Activities made inactive (this is why task numbers skip at this point)

Project Plan (Revision 0)

Task Name	Duration	Start	Finish	Predecessors	% Complete	Notes
REG AMENDMENTS	580 days	Mon 12/01/15	Fri 3/03/17		0%	
212 Prepare & submit March 2016 MPA Board paper summarising consultation outcomes & seeking approval of preferred approach	5 days	Mon 1/02/16	Fri 5/02/16	58	0%	
213 Director approval of MPA Board paper	5 days	Mon 8/02/16	Fri 12/02/16	212	0%	
214 GM approval of MPA Board paper	5 days	Mon 15/02/16	Fri 19/02/16	213	0%	
215 MPA Board meeting - in principle approval of final draft Intent & preferred approach	10 days	Mon 14/03/16	Fri 25/03/16		0%	Fixed date
216 Complete a ministerial brief to seek in-principle approval from Minister	5 days	Mon 28/03/16	Fri 1/04/16	215	0%	
217 LSU approval of Min brief	10 days	Mon 4/04/16	Fri 15/04/16	216	0%	
218 Director approval of Min brief	5 days	Mon 18/04/16	Fri 22/04/16	217	0%	
219 GM approval of Min brief	10 days	Mon 25/04/16	Fri 6/05/16	218	0%	
220 Chair approval of Min brief	10 days	Mon 9/05/16	Fri 20/05/16	219	0%	
221 Receive in-principle approval from Min to proceed with Chilling legislation	40 days	Mon 23/05/16	Fri 15/07/16	220	0%	
222 LSU prepares ExCo Legislative Instrument Bill	5 days	Mon 12/01/15	Fri 18/01/15		0%	C5 No specified date - depends on ACO
223 Prepare written instructions for LSU for the Reg amendments	14 days	Mon 28/03/16	Thu 14/04/16	215	0%	
224 Director approval of Instructions	7 days	Fri 15/04/16	Mon 25/04/16	223	0%	
225 GM approval of Instructions	14 days	Tue 26/04/16	Fri 13/05/16	224	0%	
226 LSU prepares Drafting instructions and sends to OPC	20 days	Mon 18/07/16	Fri 12/08/16	225,221	0%	
227 LSU liaises with OPC to draft the amendment	40 days	Mon 15/08/16	Fri 7/10/16	226	0%	
228 Prepare GM brief seeking approval of draft amendment	5 days	Mon 10/10/16	Fri 14/10/16	227	0%	
229 Director(s) endorse draft amendment	13 days	Mon 17/10/16	Wed 21/11/16	228	0%	
230 GMs (CBRO & BCSU) endorse draft amendment	20 days	Thu 3/11/16	Wed 30/11/16	229	0%	
231 LS prepare any additional documents required such as anatory docs and statement of compatibility	20 days	Thu 1/12/16	Wed 28/12/16	230	0%	
232 LS prepare Chairman Briefing & Ministerial Submission, requesting approval of legislative amendment package	20 days	Thu 29/12/16	Wed 25/01/17	231	0%	
233 GBRMPA Canberra office arrange lodgement with Federal Executive Council (ExCo)	5 days	Thu 26/01/17	Wed 1/02/17	232,210	0%	
234 ExCo finalising and approval	10 days	Mon 6/02/17	Fri 17/02/17	233	0%	Fixed date
235 Once approved, LS arrange for reg amendments and explanatory documents to be registered on the Federal Register of Legislative Instruments	10 days	Mon 20/02/17	Fri 3/03/17	234	0%	

Project Plan (Revision 0)

	T11skN11mi	Duratio	start	..	Rnsh	...	Predecessors ...	"	..	Notes
236	GM APPROVAL OF GUIDELINES ETC	30 days	Thu 30/03/17	Wed 10/05/17				Complete		
237	Director approval	10 days	Thu 30/03/17	Wed 12/04/17	144			0%		
238	GM brief/briefing (Inducing prep Ume)	10 days	Thu 13/04/17	Wed 26/04/17	237			0%		
239	Incorporate any changes required by GM & final GM approval	10 days	Thu 27/04/17	Wed 10/05/17	238			0%		
240	PREPARING FOR IMPLEMENTATION	10 days	Thu 21/04/17	Mon 24/05/17				0%		
241	Prepare draft Implementation Plan including Comms Plan	10 days	Thu 13/04/17	Wed 26/04/17	221,237			0%		
242	Director/SMF approval of Implementation Plan	10 days	Thu 27/04/17	Wed 10/05/17	241			0%		
243	GM approval of Implementation Plan	5 days	Thu 11/05/17	Wed 17/05/17	242			0%		
244	Final website updates	10 days	Tue 27/06/17	Mon 10/07/17	239,154			0%		
245	Internal training for EAP staff- Round 1	30 days	Thu 11/05/17	Wed 21/06/17	239,230			0%		
246	Assisi A&P with updating business procedures & templates	60 days	Thu 2/03/17	Wed 24/05/17	143			0%	Fixed date	
247	Assisi PSS with updating business procedures & templates	60 days	Thu 2/03/17	Wed 24/05/17	143			0%	Rxeddate	
248	2 x Internal Info sessions for non-EAP GBRMPA staff	10 days	Tue 11/07/17	Mon 24/07/17	243,244,154			0%		
249	Internal training for EAP staff- Round 2	20 days	Tue 27/06/17	Mon 24/07/17	246,247,154			0%		
250	Eldemal information campaign	20 days	Thu 25/05/17	Wed 21/06/17	234,239,243,154			0%		
251	IMPLEMENTATION TARGET DATE	1 day	Sat 10/07/17	Sat 10/07/17				100%		

Project Plan (Revision 0)

ATTACHMENT C - RISK ASSESSMENT & TREATMENT PLAN

Part 1: Activity Identification and Context Analysis

Activity Name	PERMISSION SYSTEM ENHANCEMENT PROJECT		Deliverable	Multiple – refer project plan	
Type of activity	Project		Branch	BCSU-EAP	
Date of risk analysis	20 Jan 2015	Duration of risk analysis	Project Sponsor	Kirstin Dobbs	Signature
Objective	Enhance the permission system in response to Program Report and ANAO findings		Key Stakeholders	Dept of Environment, QLD agencies, applicants & permittees	
External Environment Context	OLD election - 31 Jan 2015. UNESCO decision on whether to list GBR "in danger" - May 2015. Reef2050 LTSP launched March 2015				

Part 2: Risk Assessment and Treatment Plan (Please refer to the Risk Assessment Matrix to complete this section)

#	IDENTIFICATION			ANALYSIS			TREATMENT		
	Risk	Impact	Sources of the risk	Inherent risk rating			Proposed risk treatments	Who is responsible for implementing the treatment?	Target risk rating
				Consequence	Likelihood	Rating			
1	Aligned projects are delayed	Project timeframes unable to be met	Resourcing constraints Approvals barriers Emerging higher priorities Unrealistic timeframes (more resources will not resolve some of this risk)	Major	Likely	HIGH	Stay updated on progress of aligned projects and seek to work in parallel as much as possible. Advise EMG of flow-on impacts to this project.	Project manager	HIGH
2	Critical resource constraints	Project timeframes unable to be met	Resourcing constraints	Major	Likely	HIGH	Early identification of resource gaps & raise with project sponsor.	Project manager	MEDIUM

Project Plan (Revision O)

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ATTACHMENT D - [ISSUES REGISTER](#)

ATTACHMENT E - [SCOPE CHANGE REGISTER](#)

ATTACHMENT D

ISSUES REGISTER

CLOSED ISSUES

ISSUE						STATUS	RESPONSE		
#	Question I Description	For whom	Date raised	By whom	Action officer & action		Response I Action I Resolution	By whom	Date
2	EPBC has 5 levels of assessment. Does DOE expect GBRMPA to replicate these 5 levels of assessment? Or harmonise?	DOE	5-Feb-15	RER		Closed	Not required to replicate. Harmonisation is desirable, but not required.	Viki Press & Charlie Brister	13-Feb-15
3	What's the status of the 2009 Hawke review of EPBC? Are any recommendations being acted on? Specifically, in the 2009 Hawke review one recommendation was for those matters deemed to have significant impact on MNES, to allow the Minister to also consider all other impacts when making a decision. I think this recommendation was not supported in RIS report. What is status?	DOE	4-Feb-15	RER		Closed	Deemed not relevant to the current scope of work.	RER&KD	13-Feb-15
4	EPBC uses a complex cost recovery mechanism. Can DOE give us an update on how this is working, and does DOE expect GBRMPA to replicate or harmonise with this cost recovery mechanism? What about the exemption for individuals and small businesses? How would we avoid (and how does DOE avoid) a person applying for permission then transferring that permission to a company later?	DOE	6-Feb-15	RER		Closed	Not required to replicate or harmonise. GBRMPA free to pursue its own cost recovery mechanisms.	Viki Press & Charlie Brister	13-Feb-15
5	EPBC uses different language to GBRMP, eg "referral" instead of "application" and "approval" rather than "permission." To what extent are we seeking to harmonise terms to streamline and simplify our processes for clients? I see this as in the 5+ year timeframe and would require changes to primary legislation. If GBRMPA terms were to change, this would also potentially require changes to the Zoning Plan.	DOE	5-Feb-15	RER		Closed	Not required to replicate or harmonise. GBRMPA to use its own terms.	Kirstin Dobbs	12-Feb-15
6	EPBC has a referral stage which is not explicitly captured in GBRMPA process (although it is similar to our preliminary assessment upon receipt of an application to determine assessment level). Notably, the EPBC process includes public advertisement and consideration of public comments about the level of assessment. The Program Report commits GBRMPA to publicly advertising applications, but it is silent on whether/how GBRMPA must accept public comments or consider them in the determination of (a) whether the proposal is likely to impact on MNES and (b) the appropriate level of assessment. Need to clarify expectations.	DOE	5-Feb-15	RER		Closed	EPBC does not explicitly consider public comments at referral stage, it's simply that the proposal is publicly advertised. No need for GBRMPA to seek comments or to incorporate comments at the stage of determining assessment level.	Viki Press & Charlie Brister	13-Feb-15
7	A number of Program Report commitments (for example, C3) require GBRMPA to consider MNES. It's not clear whether this is only required when GBRMPA is acting under accreditation (assessing under EPBC for matters wholly within the GBRMP), or whether this is required for all applications. Specifically, if DOE is still assessing under EPBC (the majority of situations - where actions are in both State and C/h waters), isn't it duplication for GBRMPA to conduct this same assessment? Also, if this applies to all applications (not just those that meet significant MNES trigger), need to check how this would align with QPWS assessment criteria.	DOE & Reef 2050	5-Feb-15	NB		Closed	GBRMPA only required to consider MNES when EPBC is switched off.	Viki Press & Charlie Brister	13-Feb-15
8	How are we to consider impacts on community benefits derived from the environment? Does adequate info already exist on this in StratAss? If not, who is leading the development of tools/frameworks for impacts on community benefits? Is this part of SIA Guidelines	Reef2050	5-Feb-15	RER	RER - Meet with MG to clarify her scope of work	Closed	Incorporate Reef 2050's SIA and Aesthetic Guidelines into our project	Marg Gooch	24-Feb-15

CLOSED ISSUES

ISSUE						STATUS	RESPONSE		
#	Question / Description	For whom	Date raised	By whom	Action officer & action		Response / Action / Resolution	By whom	Date
9	At what stage will we do Regulation Impact Statement (RIS)?	Sponsor	5-Feb-15	RER	RER - Discuss with AB&KD	Closed	Single RIS for Reg amendments, EIM Policy, & guidelines	Kirstin Dobbs	13-Mar-15
10	Can DOE provide a list/table compiling all the documents referred to in Program Report commitments (eg, Recovery Plans, DOE 2 rocedures) with hyperlinks	DOE	5-Feb-15	NB	DOE - Viki Press	Closed	List provided	Nikki Ward	22-Mar-15
11	Are we incorporating all the Program Report commitments in the MNES chapter (Part C) only for assessments that would trigger EPBC and are wholly within GBRMP? Or more generally for all assessments?	DOE& Sponsor	9-Feb-15	RER		Closed	Consolidated with Issue 7	RER	12-Feb-15
12	Are we seeking approved class of actions for the entire GBRMP, or only C'th waters within GBRMP? How does this work if QLD does/doesn't support approvals bilat?	DOE	9-Feb-15	KO		Closed	If QLD Approval Bilal is granted, GBRMPA to seek approval for actions wholly within GBRMPA excluding State waters. If QLD Approval Bilal is not granted, GBRMPA to seek approval for actions wholly within GBRMP including State waters.	Viki Press, Charlie Brister & Josh Gibson	13-Feb-15
14	Approvals process, including: (a) Does approval have to wait until all commitments are delivered, or all Part C commitments? (b) What is the approval process and format? (c) For how long is the approval valid? For the term of the endorsed program (25 years)? (d) Do we need to seek new approval if we substantially change a policy, ciuideline or procedure?	DOE	11-Feb-15	KO		Closed	(a) Must demonstrate significant progress/intent to achieve all Part C commitments. (b) To be determined - entered as separate issue in Issue Register. © No end date on approval. (d) No, provided we still comply with intent of Program Report/Strategic Assessment.	Viki Press & Charlie Brister	13-Feb-15
24	Remove 88V(7)	ADEP	27-Mar-15	MC	Transfer to Regs list	Closed	Moved to Regs amendments suggestion list	RER	30-Mar-15
20	Notifying of permit decisions / gazetals	ADEP? PSS?	26-Mar-15	KO	Out of scope	Closed	Business procedure - doesn't need to be in guidelines, except mentioned as standard procedure. PSS to lead.	RER	9-Apr-15
21	Revoke Structures Policy & replace with guidelines	ADEP	26-Mar-15	KO	Incorporate into project	Closed	Incorporated into project - See Phase 1 Actions list	RER	9-Apr-15
13	Does Commitment 02 (prudent & feasible alternatives) require a Regulation amendment, or can this be achieved through policy? Is policy strong enough, or do we want to enshrine it in legislation as an explicit assessment criteria? Note - usually considered under 88R(a) - "take all reasonable steps to prevent or minimise ham."	LSU	11-Feb-15	RER	RER - Discuss with LSU, possible joint legal request with Hayley Gorsuch	Closed	Included in the list for consideration on the ARP. Incorporated into project - See Phase 1 Actions list.	KG	21/04/2015
17	Does Commitment 15 (net benefits) require a Regulation amendment in order to be implemented through permits? Note that conditions of approval have been deemed by courts to only be valid where they are proportional to the impacts caused by the development – that is, offsets are OK but you can't require someone to fix a mess they didn't cause.	LSU	23-Feb-15	RER	RER - Joint legal request with Jason Vains.	Closed	21/04/2015 - Legal advice provided. Regulation amendment would allow the explicit consideration of net benefit through the assessment and granting of permits. The proposed regulation amendment has been included in the list for consideration on ARP. Further work to be led by Reef 2050.	KG	21/04/2015
19	Issue with Program Report Commitments C04 and C05. These commitments require GBRMPA to consider DOE policy and guidelines as part of the assessment and decision making process. GBRMP regulations are very clear that we can only consider 88R (d) "any policies or guidelines issued by the Authority" or 88R (h) any relevant Commonwealth Law or a relevant plan made under such law.	DOE? EMG	24/03/2015	NB	Decision on best way forward - Reg change, or explicitly stating certain principles in GBRMPA policy	Closed	Add to EIM guidelines that these policies will be considered under 88Q(f).	KG	21/04/2015

CLOSED ISSUES

ISSUE						STATUS	RESPONSE		
#	Question / Description	For whom	Date raised	By whom	Action officer & action		Response/Action / Resolution	By whom	Date
25	Application forms: have s.37 of the Crimes Act on the forms i.e. as part of the application process they provide any relevant information about convictions etc... in relation to the Crimes Act or breaches of environmental legislation. Also making them note that authorised contacts are also required to provide such information. That way we don't have to chase information. If they've had breaches in the last 10 years then they need to tell us about it irrespective of whether in GBR or elsewhere.	ADEP	17-Mar-15	KD	Incorporate into updated permit application forms	Closed	Added to Phase 1 Actions list	ADEP	13-May-15
1	EPBC uses "action management plans" to implement adaptive management through permits. Can we get some examples of both the conditions and the resultinQ action management plans?	DOE	6-Feb-15	RER		Closed	Move to Phase 2 - adaptive mgmt conditions	RER	1-Jun-15
22	Bond Guidelines - committed to industry to be done by Sep 2015	ADEP	26-Mar-15	KD	PSS currently leading	Closed	Added to Phase 1 Actions list	RER	1-Jun-15
23	Pontoon Guidelines - committed to industry to be done by Sep 2015	ADEP	26-Mar-15	KD	PSS currently leading	Closed	Added to Phase 1 Actions list	RER	1-Jun-15
26	Find a way that permittees have to acknowledge receipt of permits and that they understand all the conditions on the permit	ADEP	17-Mar-15	KD		Closed	DOE do not have a process for this. They only send draft conditions to proponent for comment before finalising. Moved to Phase 1 Actions list.	RER	1-Jun-15
30	Various ANAO findings - Refer separate tab	ADEP	12-May-15	ANAO	Incorporate into policy & guidelines, discuss scope with EAP & agree what aspects are in/out ADEP	Closed	Include in Policy with further detail & examples in Guidelines. Moved to Phase 1 Actions list.	RER	1-Jun-15
33	Not clear how/whether GBRMPA can consider impacts outside the MP. Hence not clear whether EPBC Act equivalency is achievable.	DOE	25-May-15	RER	Raise with DOE, possibly seek Legal advice.	Closed	At 2 Jun mtng, DOE said this was issue with bilaterals also. Proceed on basis that this is low risk (very infrequent) so don't dedicate time/effort to it until/unless it becomes an issue.		
42	Regs appear to require fisheries to have a permit for Take of Protected Species. (1) None currently do. (2) There does not appear to be any internal process or guidelines for assessing under 888 whether such a permit should be issued. (3) It could be captured under "low impact activity" but only after an assessment which determined this -- and need a process for regularly reviewing this decision.	ADEP & Reef Recovery & FMCU	13-Aug-15	RER & Chloe Schauble	Discuss with Reef Recovery & FMCU. Possible legal request.	Closed	Not the primary purpose of use/entry so doesn't require a permit. Take is incidental impact	RER	28-Sep-15
31	EPBC decisions (recommendation report) are published on website. Does GBRMPA need to publish SORs for Level 3 & 4 proposals?	ADEP & DOE	12-May-15	RER	Ask DOE at 2 June meeting	Closed	Not required, but desirable. Added to Phase 1 Actions list.	RER	28-Sep-15
32	To what extent are the social "values" we're using captured in the objects of the Act? For example, the Act specifies that primacy is to be given to protecting biodiversity, heritage & cultural values; with sustainable use secondary. Is "Income" therefore a primary value (to be protected), or a secondary benefit (to be allowed only where it doesn't degrade primary values)?	Reef 2050	22-May-15	RER	Ask Reef 2050 for thoughts	Closed	Refer Issue 39 for follow-up action	RER	28-Sep-15
18	Resourcing - one of the biggest issues is EAP having sufficient resources to review draft documents (including those generated within EAP) and ensure matters are ready for implementation once all public consultation, RIS and regulations are in place. {KD comment}	EMG	16/03/2015	KD	KD to raise at 17/3/15 EMG meeting	Closed	Included in Phase 1 tasks - Implementation Plan	RER	30-Oct-15

CLOSED ISSUES

ISSUE						STATUS	RESPONSE		
#	Question / Description	For whom	Date raised	By whom	Action officer & action		Response / Action / Resolution	By whom	Date
29	Long-term permits for low-risk activities such as tourism - including QuEST and Eco-Certified implications	T&S	1-May-15	RER	Mtng with T&S on 19 May to discuss. Follow-up by Sep 2015.	Closed	Discussed with VB on 18 May. Flow-on actions & discussions required, but several options available. Sep15 - Tasked to Emily. Removed from Issues Register and put on Phase 1 Actions list.	RER	30-Oct-15

PHASE 1 ACTIONS

Keyword	Deliverable(s)	Don't forget to deliver on these actions / resolve these issues:	Progress code (0-Not started, 1-Drafting, 2-Consulting internally, 3-Consulting externally, 4-Finalising, 5-Completed)	Progress notes (include dates)
BBQ & 88R	Assessment report template	Assessment report to explain why each Reg consideration was & wasn't deemed relevant	1	30Jul15 - In draft guidelines, pending Reg changes before can be finalised
880 & 88R	Guidelines	Matrix plotting values against operations, to easily show assessors which values need to be considered for certain activities. Note the StratAss matrix has some of these, but not all values or activities, and the activities don't always match our "operation" or "activity" terms that we use on permits.	1	30Jul15- Still to be actioned. 28Oct15-To be included in contract scope for Risk Mgmt Framework.
880 & 88R	Guidelines	Need more consistent assessment against all mandatory considerations	2	30Jul15 - Proposed Reg amendment to make all criteria mandatory
880 & 88R	Standard assessments	Review & update standard assessment reports to cover all relevant / common considerations	0	30Jul15 - Scheduled for Apr-Jun 2017
880 & 88R	Standard assessments	Update risk assessments for standard permit assessments	0	30Jul15 - Scheduled for Apr-Jun 2017
88R(j) - Suitable person	Guidelines	Guidance on how "suitable person" is assessed. What sort of history is so unacceptable that permit may be refused? How do you get back on GBRMPA's good books? Can we consider international environmental history? What about applicants who are applying on behalf of some other proponent (with the other proponent actually funding it)?	2	30Jul15 - In draft guidelines but requires further legal advice & discussion. Oct2015 - Legal request sent.
Alternatives	Policy & Guidelines	Provide new guidance material on how to identify & evaluate prudent & feasible alternatives, including in what circumstances GBRMPA considers that "all reasonable steps" have been taken.	2	30Jul15 - In draft guidelines but requires further discussion once Reg amendments are finalised through consultation. 16Oct15 - Included in Round 1 consultation document.
Application	Application forms	Have s.37 of the Crimes Act on the forms i.e. as part of the application process they provide any relevant information about convictions etc... in relation to the Crimes Act or breaches of environmental legislation. Also making them note that authorised contacts are also required to provide such information. That way we don't have to chase information. If they've had breaches in the last 10 years then they need to tell us about it irrespective of whether in GBR or elsewhere.	0	To be included in Permit Application Forms sub-project for action in Apr-Jun 2017.
Application	Guidelines	Guidance on what constitutes a "commercial activity," especially given overlap nowadays with commercial ventures supporting research/education.	1	30Jul15 - Review previous legal advice & consider whether additional legal advice is needed. 29Oct15-Tasked to TA.
Application	Policy & Guidelines	Explain what constitutes a "use or entry" which in turn triggers (potentially) the need for a permit	1	30Jul15 - Need to seek legal advice and add to policy & Guidelines. Tasked to RER.

Items for EAP Mgmt Workshop

PHASE 1 ACTIONS

Keyword	Deliverable(s)	Don't forget to deliver on these actions / resolve these issues:	Progress code (0-Not started, 1-Drafting, 2-Consulting internally, 3-Consulting externally, 4-Finalising, 5-Completed)	Progress notes (include dates)
Application, PAAF, FINFO	Application forms	Require fees & minimum information to be submitted before application is accepted as valid. Link to RMS functionality.	2	30Jul15 - Proposed Reg amendment. Raised with RMS project. 29Oct15 - Tasked to TA.
Assessment level	Policy	Better explain rationales for assigning risk levels to permit applications	2	30Jul15 - In draft policy out for EAP comment
Assessment report	?	Possibly out of scope Oust SOP) - Fraud Control Plan commits to setting up a system for Level 3-4 applications to have recommendations jointly developed by at least 2 people. This is to avoid/control opportunity for fraud, where the assessing officer puts up an improper recommendation.	NA	Deemed out of scope and A&P/PSS task
Bonds	Guidelines	Need better guidance on determining bonds	1	30Jul15 - PSS lead. 28Oct15 - Include in contract for Risk Mgmt Tools.
Conditions	Assessment report template & Guidelines	Document in assessment report why new/revised conditions are recommended (for delegate's consideration)	1	30Jul15 - In draft guidelines
Conditions	Assessment report template & Guidelines	Document in assessment report why additional permissions were granted when they weren't requested	NA	Deemed out of scope - not allowed to do this anyway
Conditions	Guidelines	Procedures need to indicate how assessors are to develop/tailor permit conditions relevant to the activity recommended for approval or refusal.	1	30Jul15 - In draft guidelines
Conditions	Policy & Guidelines	Establish when different mgmt tools (insurance, indemnity, deed, bond, EMP) will be used and why.	1	30Jul15 - PSS lead. 28Oct15 - Include in contract for Risk Mgmt Tools.
EMPs	Guidelines	Need better guidance on using EMPs	1	30Jul15 - In draft guidelines. 28Oct15 - Include in contract for Risk Mgmt Tools.
Fixed facility	Guidelines	Bond Guidelines	1	30Jul15 - PSS lead. 28Oct15 - Include in contract for Risk Mgmt Tools.
Fixed facility	Guidelines	Pontoon Guidelines	1	30Jul15 - PSS lead. 28Oct15 - Include in contract for Risk Mgmt Tools.
Fixed facility	Policy & Guidelines	Map out everything in current Structures Policy and make sure it gets captured in new Policy & Guidelines. Also identify new elements to be included.	2	30Jul15 - In draft policy out for GBRMPA comment
Fixed facility	Policy & Guidelines	Specify requirements for different types of facilities - design, inspection, maintenance, deeds, bonds, etc.	2	30Jul15 - In draft policy out for GBRMPA comment. 28Oct15 - Include in contract scope for Managing Facilities.

Items for EAP Mgmt Workshop

PHASE 1 ACTIONS

Keyword	Deliverable(s)	Don't forget to deliver on these actions / resolve these issues:	Progress code (0-Not started, 1-Drafting, 2-Consulting internally, 3-Consulting externally, 4-Finalising, 5-Completed)	Progress notes (include dates)
Fixed facility	Policy, Guidelines, Application forms	Assessments for structure continuation permits need to consistently ascertain the condition of the structure	1	30Jul 15 - In draft guidelines
Net Benefit	Policy & Guidelines	Provide new guidance material on how Net Benefits will be implemented through the permission system.	NA	Deemed out of scope - Reef 2050 lead
NTN	Guidelines	Develop guidance on the relevant NTN bodies for assessors	1	Sep15 - Tasked to TA
NTN	Guidelines	Better explain how Native Title responses are considered during assessment	1	30Jul15 - In draft guidelines
PAAF	Regulations	Guidance on when fee is waived because of "minimal assessment"	1	30Jul15- Need to add to Application Guidelines. Oct15 - Tasked to TA.
PAAF	Regulations	Opportunity to streamline & rationalise fees.	1	30Jul15 - Need to discuss & resolve. Include on mgmt workshop agenda. 16Oct15 - Included in Round 1 consultation document. 29Oct15 - Tasked to TA.
PAAF	Regulations & Guidelines	Clarify definitions and interpretations related to PAAF - what is an "activity" versus "facility?" When is the application "further" versus "initial" (for continuations with new permissions)?	0	30Jul15 - Need to add to Guidelines. Oct15 - Tasked to TA.
Part 5	Policy & Guidelines	Need consistent approach across GBRMPA to managing Part 5 purposes	1	30Jul15 - Need to discuss at mgmt level. Include on momt workshop agenda.
Permit	?	Find a way that permittees have to acknowledge receipt of permits and that they understand all the conditions on the permit	0	30Jul15 - Need to discuss & resolve. Include on mgmt workshop agenda.
Permit	?	Need to find a way to clearly specify what is being permitted, especially for complex activities. For example, EPBC can use the referral number and say, "We're approving what was proposed in the documentation." We have no shorthand way of specifying what's being permitted. This means that we either spend a lot of time in permits describing what's permitted, or (more frequently) we don't clearly specify. So we might just permit "a jetty" but without referring to design drawings it could be any jetty. In GKI example, nowhere in the permit does it specify that dredge material must be contained in geotextile bags (as proposed).	0	30Jul15 - Need to discuss & resolve. Include on mgmt workshop agenda.
Permit	Policy & Guidelines	Explain why different applications get different permit terms - why are some shorter and some longer?	2	30Jul15 - In draft policy out for GBRMPA comment
Permit	Policy & Guidelines	Explain what types of changes to permits are modifications and which require a new assessment.	2	30Jul15 - In draft policy out for GBRMPA comment

Items for EAP Mgmt Workshop

PHASE 1 ACTIONS

Keyword	Deliverable(s)	Don't forget to deliver on these actions / resolve these issues:	Progress code (0-Nat started, 1-Drafting, 2-Consulting internally, 3-Consulting externally, 4-Finalising, 5-rmm1oto,i\	Progress notes (include dates)
Public Advertising	Policy & Guidelines	Consistent guidance on when public advertising is required	2	30Jul15 - In draft policy out for GBRMPA comment
SOR	Assessment report template	Delegate to clearly document reasons for making decision at time the decision is made	0	30Jul15 - Scheduled for Apr-Jun 2017
SOR	Assessment report template, Standard assessments	Assessment report to double as SOR - Hopefully we just need to "top and tail" the template so it specifies delegations, etc in the way required for a SOR.	0	30Jul15 - Scheduled for Apr-Jun 2017
SOR	Assessment report template, Standard assessments, Assessment coversheet	Publish assessment reports for Level 3 & 4 proposals, except perhaps the "intelligence" components sometimes contained in 88RU). This is similar to how DOE publishes the "recommendation report" that goes to the Minister as well as the signed Minister's decision. Perhaps we could move any unsubstantiated intelligence relevant to 88RU) into a covering brief and confine the assessment report to documented breaches.	1	30Jul15 - Need to discuss & resolve. Include on mgmt workshop agenda. Oct15 - Included in legal request about "suitable person" criterion.
Application	Application forms & Standard assessments & Standard Permits	Confirm which activities, locations & parameters (such as vessel size or pax) should be included in fast-track permits for Tourism and Commercial Research. Are there other fast-track permits desired (such as Scientific Research? Education Program? certain low risk facilities?)	1	30Jul15 - Initial consultation with T&S on 19May15. Need to follow up with EAP, T&S, QPWS and others prior to consultation in Oct 2015. Sep15 - Tasked to ES.
Application	Policy & Guidelines	There are a range of activities which may or may not require a permit that GBRMPA needs to determine a position on. Examples include; vessel-to-vessel refuelling, vessel hull cleaning, vessel painting, other vessel at-sea maintenance activities.	1	30Jul15 - Need to discuss & at least come up with a list for prioritisation. Include on mgmt workshop agenda.
Risk Mgmt Framework	Policy & Guidelines	Review Risk Mgmt Framework to (a) consider whether/how to incorporate vulnerability or adaptive capacity; (b) consider whether/how to incorporate confidence levels for evidence; © roll up and nest the detailed values risk assessment tables into overall tables - consultancy identified in project plan.	1	Jul15 - Some elements included in draft Guidelines. Oct15 - Include in contract scope for Risk Mgmt Framework.
Low impact activities	Guidelines	Guidelines for determining low impact activities - Who decides? What limits are placed on the decision? Expiry or review date? Who can make the decision? How to record the decision?	1	From 7 Aug 2015 managers workshop

Items for EAP Mgmt Workshop

PHASE 1 ACTIONS

Keyword	Deliverable(s)	Don't forget to deliver on these actions / resolve these issues:	Progress code (0-Not started, 1- Drafting, 2- Consulting internally, 3- Consulting externally, 4- Finalising, 5- Completed)	Progress notes (include dates)	Items for EAP Mgmt Workshop
Implementation	Implementation Plan	Resourcing - one of the biggest issues is EAP having sufficient resources to review draft documents (including those generated within EAP) and ensure matters are ready for implementation once all public consultation, RIS and regulations are in place. {KD comment}	0	3Nov15 - Include in Implementation Plan to be developed May-Jun 2017	

DESIRED RMS FUNCTIONALITY

Issue / Description	Suggested functionality	Prelim Priority	Agreed Priority
Administrative burden of acknowledging receipt of permits. Failure to consistently acknowledge raised by ANAO.	Automatic email message confirming receipt of valid application, or alternately advising that the application submitted is not valid due to missing information or fee.	High	
Administrative burden of keeping authorised contacts up to date. Contacts are often incorrect or out of date, making communication with permittees difficult.	Shift onus onto applicants/permittees to maintain correct authorised contact details. External module for entering & updating this information. Quarterly automatic email reminding them to check & update.	Medium	
Delays in processing applications due to chasing up information from applicants.	Shift onus onto applicants to provide all information at the time of application in order for the application to be valid. Need an external module for permit application form which also auto-generates a list of information required and allows all this information to be uploaded. Need a save function so this can be done over several weeks.	High	
Administrative burden in invoicing for fees, reminding fees are due, and if application lapses due to non payment of fees, de-registering and re-registering the new application.	Shift onus onto applicants to provide fee at time of application in order for the application to be valid. GBRMPA can still invoice/refund if they get it wrong. Need an external module for permit applications which includes a secure payment function and auto-generates an email receipt.	High	
Administrative burden of Native Title Notifications	Need an auto-generated NTN upon submission of a valid application. This would reference the field for "brief description of proposal" as well as location(s) and any other particulars.	Low	

ANAO Findings

ANAO Paper	IN / OUT of scope for ADEP	Recommendation <i>(Repeats in blue italics)</i>	Proposed ADEP response
2.04	IN	Procedures need to indicate how assessors are to develop/tailor permit conditions relevant to the activity recommended for approval or refusal.	Revised Policy provides general principles around setting conditions, including that they are relevant to the proposed activity. New Guidelines for Assessment will provide further detail and examples on how to set SMART permit conditions.
2.04	OUT	Procedures need to clearly outline how or when certain aspects of the assessment process are to be done, such as company checks, NTN, public advert, QPWS referral, managerial reviews	SOP
2.04	OUT	Procedures need to indicate how assessors are to develop/tailor assessment reports or coversheets relevant to the activity recommended for approval or refusal.	SOP
2.05	IN	Streamline & consolidate policy & guidance materials, and expand coverage & clarify	Revised Policy & new Guidelines will implement this recommendation.
2.05	OUT	Streamline & consolidate SOPs & administrative procedures	SOP
2.08	IN	• Better explain rationales for assigning risk levels to permit applications	Include in Policy with further detail & examples in Guidelines
2.14	OUT	More consistent & timely acknowledgement of receipt of permit applications	RMS functionality desired - auto receipt function
2.17	OUT	More consistently document company checks	RMS functionality desired / Record-keeping
2.18	OUT	More consistently retain/document FINFOs and info received	RMS functionality desired / Record-keeping
2.19	IN	Develop guidance on the relevant NTN bodies for assessors	Include in Guidelines for Assessment
2.21	IN	Better explain how Native Title responses are considered during assessment	Include in Policy with further detail & examples in Guidelines
2.21	OUT	More consistently retain/document NTN & responses	RMS functionality desired / Record-keeping
2.23	OUT	Review internal referral requirements & more consistently follow/document these procedures	SOP
2.25	OUT	Review QPWS referral requirements & more consistently follow/document these procedures	SOP

ANAO Findings

ANAO Paper	IN / OUT of scope for ADEP	Recommendation <i>(Repeats in blue italics)</i>	Proposed ADEP response
2.28	N	Consistent guidance on when public advertising is required	Include in Policy with further detail & examples in Guidelines. Note Regs amendment to require public advert if impacts on MNES.
2.31	OUT	Review checklist ('pink sheet') & more consistently follow/document these procedures	SOP
2.33	OUT	Review supervisor/manager review points during the assessment process & more consistently undertake & document these reviews	SOP
<i>2.37</i>	<i>IN</i>	<i>Streamline & consolidate policy & guidance materials, and expand coverage & clarify</i>	<i>Repeats 2.05</i>
<i>2.37</i>	<i>OUT</i>	<i>Streamline & consolidate SOPs & administrative procedures</i>	<i>Repeats 2.05</i>
3.08	N	Assessments for structure continuation permits need to consistently ascertain the condition of the structure	Include in Policy ('structures must be maintained & inspected regularly') and Guidelines (under 880 & 88R explanations)
3.08	N	Need better guidance on determining bonds	Include in Guidelines
3.08	N	Need better guidance on using EMPs	Include in Guidelines
3.10	N	Need more consistent assessment against all mandatory considerations	Include in Guidelines.
3.14	N	Review & update standard assessment reports to cover all relevant / common considerations	Add-on task for ADEP to update standard permit assessments
3.17	N	Assessment report to explain why each Reg consideration was & wasn't deemed relevant	Update assessment report template
3.21	N	Update risk assessments for standard permit assessments	Add-on task for ADEP to update standard permit assessments
<i>3.25</i>	<i>IN</i>	<i>Update risk assessments for standard permit assessments - related to compliance risks</i>	<i>Duplicates 3.21. Compliance risk is different to environmental risk.</i>
<i>3.29</i>	<i>OUT</i>	<i>Review supervisor/manager review points during the assessment process & more consistently undertake & document these reviews</i>	<i>Duplicates 2.33.</i>
<i>3.38</i>	<i>IN</i>	<i>Update risk assessments for standard permit assessments - related to compliance risks</i>	<i>Duplicates 3.21 & 3.25</i>

ANAO Findings

ANAO Paper	IN / OUT of scope for ADEP	Recommendation <i>(Repeats in blue italics)</i>	Proposed ADEP response
3.39	OUT	<i>Review supervisor/manager review points during the assessment process & more consistently undertake & document these reviews</i>	<i>Duplicates 2.33 & 3.29</i>
3.40	IN	<i>Update risk assessments for standard permit assessments - related to compliance risks</i>	<i>Duplicates 3.21, 3.25, 3.38</i>
3.40	OUT	<i>Review supervisor/manager review points during the assessment process & more consistently undertake & document these reviews</i>	<i>Duplicates 2.33, 3.29, 3.39</i>
4.10	N	Delegate to clearly document reasons for making decision at time the decision is made	Update assessment report template
4.18	N	Suggested permit conditions	These will be considered in Guidelines, however not all are deemed to be within the scope of GBRMPA's jurisdiction and/or relevant or desirable to the risks posed.
4.19	OUT	Document in assessment report why additional permissions were granted when they weren't requested	? Legally we can't do this - need applicant's consent
4.19	OUT	Advise permittees about permissions which they didn't request	? Legally we can't do this - need applicant's consent
4.21	OUT	Advise permittees about permissions which they didn't receive or which weren't granted to the full extent (numbers/locations) as requested	SOP / Cover letter template update
4.22	OUT	Advise permittees about changes to permit conditions upon continuation/modification	SOP / Cover letter template update
4.24	OUT	<i>Better draw attention to differences between permit & original request, or previous permit & new permit</i>	<i>Repeats 4.19, 4.21 & 4.22</i>
4.25	OUT	Individually brief each permittee on their conditions	SOP / Cover letter template update
4.26	OUT	More consistently provide copy of permit to QPWS	RMS/SOP
4.28	OUT	More consistently follow up post-permit approvals, especially EMPs, research comms strategies & installation of moorings	PSS lead / RMS functionality

ANAO Findings

ANAO Paper	IN / OUT of scope for ADEP	Recommendation <i>(Repeats in blue italics)</i>	Proposed ADEP response
4.29	IN	<i>Delegate to clearly document reasons for making decision at time the decision is made</i>	<i>Repeats 4.10</i>
4.30	OUT	<i>Better draw attention to differences between permit & original request, or previous permit & new permit</i>	<i>Repeats 4.19, 4.21, 4.22, 4.24</i>
4.31	OUT	<i>More consistently follow up post-permit approvals, especially EMPs, research comms strategies & installation of moorings</i>	<i>PSS lead/ RMS functionality</i>
4.32	IN	Document in assessment report why new/revised conditions are recommended (for delegate's consideration)	Mention in Guidelines at high level, PSS to support with SOP.
4.32	OUT	<i>Better communicate to permittees their permissions & conditions</i>	<i>Repeats 4.19, 4.21, 4.22, 4.24</i>
4.32	OUT	<i>More consistently follow up post-permit approvals, especially EMPs, research comms strategies & installation of moorings</i>	<i>Repeats 4.31</i>

ATTACHMENT E

SCOPE CHANGE REGISTER

