



Application for Licence Amendment

Part V Division 3 of the *Environmental Protection Act 1986*

Licence Number	L6378/1987/14
Licence Holder	Romine Holdings Pty Ltd
ACN	009 331 800
File Number	DWERVT15982~1
Premises	Wren Oil 157 Harris Road PICTON EAST 6229 Legal description – Lot 8 on Diagram 53241 Certificate of Title Volume 2204 Folio 90; and Lot 40 on Deposited Plan 76308 Certificate of Title Volume 2948 Folio 927 As defined by the premises map (Figure 1) attached to the revised licence
Date of Report	24 January 2025
Decision	Revised licence granted

an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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1. Decision summary

Licence L6378/1987/14 is held by Romine Holdings Pty Ltd (Licence Holder) for the Wren Oil premises (the premises), located at 157 Harris Road, Picton East.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the construction and operation of the premises. As a result of this assessment, revised Licence L6378/1987/14 has been granted.

The revised licence issued as a result of this amendment consolidates and supersedes the existing licence previously granted in relation to the premises. The revised licence has been granted in a new format with existing conditions being transferred, but not reassessed, to the new format.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

2.2 Application summary

On 10 September 2024, the Licence Holder submitted an application to the department to amend Licence L6378/1987/14 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act).

The applications relates to decommissioning and replacement of the tank farm areas across the premises due to the construction of a new operations building requiring site layout changes. The following amendments are being sought:

- Removal of the tank farm (south) and tank farm (shed). Tanks will be reused where possible or recycled as scrap metal. Any product in the tanks will be transferred to other tanks prior to relocation or recycling.
- Removal of the maintenance shed. Equipment and material will be relocated to other areas within the premises, including the new fabrication and mechanical shed, or if applicable, recycled as scrap metal.
- Removal of the 'other offices'. Infrastructure will be re-used where possible, otherwise material will be disposed of appropriately to licenced landfill facilities.
- Extension to the main tank farm for storage of hydrocarbon material that is processed under Category 39. This is to recoup the volumes associated with the removal of the other tank farms. The main tank farm extension includes:
 - Construction of a new concrete bund, which will adjoin the existing concrete bund around the main tank farm. The concrete bund will have 150 mm wide walls and a 200 mm deep base. A vapour barrier will also be installed under the new bunded area and will extend to the bund wall separating the old and new areas.
 - The new tanks will be installed with shrouds (the same as current tanks). The shrouds ensure that if a leak occurs, the leaked material stays contained within the bunded area.

- To align with current operations, stormwater collecting in the new bund will be directed to the oil and water separator already installed within the main tank farm and after treatment, will be discharged to the swale drain.
- If existing monitoring bore (MB01b) located in the area of the main tank farm extension cannot be maintained as part of the works, it will be relocated to an adjacent similar location and installed to the same standards.
- Removal of decommissioned infrastructure and redundant conditions that have been completed, as well as changes to infrastructure naming.

Apart from moving the tank farm capacity to a single location within the premises, none of the existing infrastructure, activities or management processes are proposed to change as part of the amendment, and accordingly no changes to the emissions or discharges from the premises are expected.

No change to the production or design capacity for Category 39, Category 61 and Category 61A are proposed or required as a result of the amendment.

Table 1 below outlines the proposed changes to the existing licence.

Table 1: Summary of proposed amendments

Category	Current design or throughput capacity	Proposed design or throughput capacity	Description of proposed amendment
Category 39: Chemical or oil recycling	80,000 tonnes per annual period	No change	<u>Decommissioning:</u> <ul style="list-style-type: none"> ● Tank farm (south) and tank farm (shed) <u>Construction:</u> <ul style="list-style-type: none"> ● Extension to the main tank farm to recoup the volumes associated with the removal of the other tank farms. <u>Operations:</u> <ul style="list-style-type: none"> ● Operation of the main tank farm extension consistent with current operations at the premises.
Category 61: Liquid waste facility	80,000 tonnes per annual period	No change	
Category 61A: Solid waste facility	20,000 tonnes per annual period	No change	

2.3 Conversion of licence

Except where related to the amendment application, the obligations of the Licence Holder have not changed in converting the licence to the new format.

In converting the licence, the CEO has:

- updated the format and appearance of the licence;
- revised licence condition's numbers, and removed any redundant conditions or definitions and realigned condition numbers for numerical consistency; and
- corrected clerical mistakes and unintentional errors.

The full consolidation of licence conditions as they relate to this revised licence are detailed in Section 5.1.

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk assessments* (DWER 2020).

To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises construction and operation which have been considered in this Amendment Report are detailed in Table 2 below.

Table 2 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

Table 2: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Dust	Decommissioning and removal of tank farms and ancillary buildings Construction of main tank farm extension	Air/windborne pathway	None proposed.
Noise	Decommissioning and removal of tank farms and ancillary buildings Construction of main tank farm extension		None proposed.
Odour	Decommissioning and removal of tank farms Transfer of hydrocarbons between trucks and tank farm extension Storage of hydrocarbons in tank farm extension		Waste in the tanks will be transferred to other tanks prior to decommissioning. Replication of existing infrastructure and management controls: <ul style="list-style-type: none"> - Hydrocarbons are transferred from the collection tanks to the waste oil storage tank via a closed pipe system. - Closed pipe system to direct gases from the tank farm to the thermal oxidiser. - Carbon pod filtration system (or similar) on individual storage tanks not connected to the closed pipe system. - Thermal oxidiser combusts gases and odours from the tank farm.

Emission	Sources	Potential pathways	Proposed controls
Hydrocarbons and contaminated stormwater	<p>Decommissioning and removal of tank farms</p> <p>Spills, leaks, overflows or containment failures from the tank farm extension, pipelines and oily water separator</p>	<p>Overland runoff</p> <p>Seepage through soil to groundwater and migration in groundwater</p>	<p>Waste in the tanks will be transferred to other tanks prior to decommissioning.</p> <p>Concrete bunding around tank farm extensions with 150 mm wide concrete walls and 200 mm deep concrete base.</p> <p>Vapour barrier will be installed under the new bunded area and will extend to the bund wall separating the old and new areas.</p> <p>New bund will have a capacity of 120 m³, which will increase the total bunded capacity for the main tank farm to 590 m³. This will provide the volume of at least 110% of the largest tank.</p> <p>New tanks will be installed with shrouds, which is the same as current tanks.</p> <p>Stormwater collecting in the new bund will be directed to the existing oil and water separator.</p> <p>Replication of existing infrastructure and management controls:</p> <ul style="list-style-type: none"> - Bunding is in accordance with <i>AS1940-2004 The Storage and Handling of Flammable and Combustible Liquids</i> and Dangerous Goods licence. - Hydrocarbon containing material will be stored in bunded areas or double bunded tanks. - Truck movements are managed to ensure liquid waste transported to the premises can be managed within the available storage. - Process telemetry monitoring to enable spills and leaks to be identified quickly. - Spills will be cleaned up immediately, with a spill equal to or less than 20 L considered minor and anything above 21 L considered major. - Spill kits and absorbents will be used to clean up spills which are readily available at various locations throughout the facility. - Material used in the spill cleanup will be processed within the facility. This includes disposal in the designated waste bins for offsite disposal.

Emission	Sources	Potential pathways	Proposed controls
Potentially contaminated stormwater	Discharge of treated stormwater to swale drain	Overland runoff Seepage through soil to groundwater and migration in groundwater	<p>Stormwater collecting in the new bund will be directed to the existing oil and water separator to remove any potential hydrocarbons before discharge to the swale.</p> <p>Replication of existing infrastructure and management controls:</p> <ul style="list-style-type: none"> - Collection of potentially contaminated and contaminated stormwater via PVC pipe and/or concrete lined open drains in the southern portion of the site. - Hardstand areas (concrete/bitumen) direct stormwater to concrete lined open drains which direct the stormwater to the large concrete sump. - Concrete sump (20 m x 10 m x 2.3 m deep) to capture untreated stormwater. - Potentially contaminated stormwater is pumped automatically from the concrete sump to the stormwater infiltration pond via one of two oil and water separators. - Stormwater infiltration pond (48 m x 8 m x 1.3 m deep) for the storage / discharge of treated stormwater. - Oil water separators are checked and maintained regularly by an external contractor to ensure functionality. - Excess treated stormwater is generally pumped to Lot 8 between June and August to prevent overtopping of the stormwater infiltration pond. - Lot 8 is visually inspected for ponding and water runoff when treated stormwater is pumped from the stormwater infiltration pond.

3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the Delegated Officer has excluded employees, visitors and contractors of the Licence Holder's from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 3 and Figure 1 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental siting* (DWER 2020)).

Table 3: Human and environmental receptors and distance from prescribed activity

Receptors	Distance from prescribed activity
Human receptors	
Closest sensitive receptor – Rural residential premises (RR1)	160 m south of premises boundary
Sensitive receptors – Rural residential premises (RR2, RR3, RR4, RR5, RR6, RR7, RR8)	165 m southwest, 315 m south, 330 m west, 400 m west, 480 m west, 565 m south-southeast and 610 m west of premises boundary
Closest commercial/industrial receptors – CI 1	100 m north of the premises boundary
Commercial/industrial receptors – CI2, CI3, CI4, CI5, CI6	265 m east, 485 m south, 570 m northeast, 630 m northwest and 640 m west of the premises boundary
Environmental receptors	
Underlying groundwater – Superficial aquifer (non-potable purposes) of the proclaimed Bunbury Groundwater Area	<p>Groundwater monitoring indicates that groundwater beneath the premises ranges from approximately 11 mAHD in the northwest to 14 mAHD in the southeast. Groundwater is relatively shallow at approximately 1 to 6 mbgl, with the shallowest depths in the southeast section of the premises.</p> <p>Groundwater was found to generally flow in a westerly direction.</p> <p>The nearest licensed groundwater bore is located approximately 385 m west of the premises boundary. A further two licensed bores are located 440 m and 470 m west of the premises.</p>
Inland waters – Ferguson River part of the Leschenault Management Area gazetted under the <i>Waterways Conservation Act 1976</i> . Multiple records of Carter’s freshwater mussel (<i>Westralunio carteri</i>) occur in the surrounding area	Approximately 250 m south and 320 m west of the premises boundary
Native vegetation – Contributing to a core regional ecological linkage and comprises Western Ringtail Possum and black cockatoo habitat. Multiple records of threatened and priority flora and fauna species occur in the surrounding area	Native vegetation is located within the western third of the premises that continues outside the western boundary of the premises. Multiple patches of native vegetation are located within 2 km of the premises boundary in all directions.
Threatened (TEC) and Priority (PEC) Ecological Communities – Banksia Dominated Woodlands of the Swan Coastal Plain	Located within the premises and within 2 km of the premises boundary

Receptors	Distance from prescribed activity
DBCA legislated tenure – Unnamed CALM Act s.5(1)(h) timber reserve	Approximately 375 m southwest of the premises boundary
DBCA legislated tenure – Unnamed CALM Act s.5(1)(d) nature reserve	Approximately 480 m south of the premises boundary

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are incomplete they have not been considered further in the risk assessment.

Where the Licence Holder has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the Delegated Officer considers the Licence Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the Licence Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 4.

The revised Licence L6378/1987/14 that accompanies this Amendment Report authorises emissions associated with the operation of the premises.

The conditions in the Revised Licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

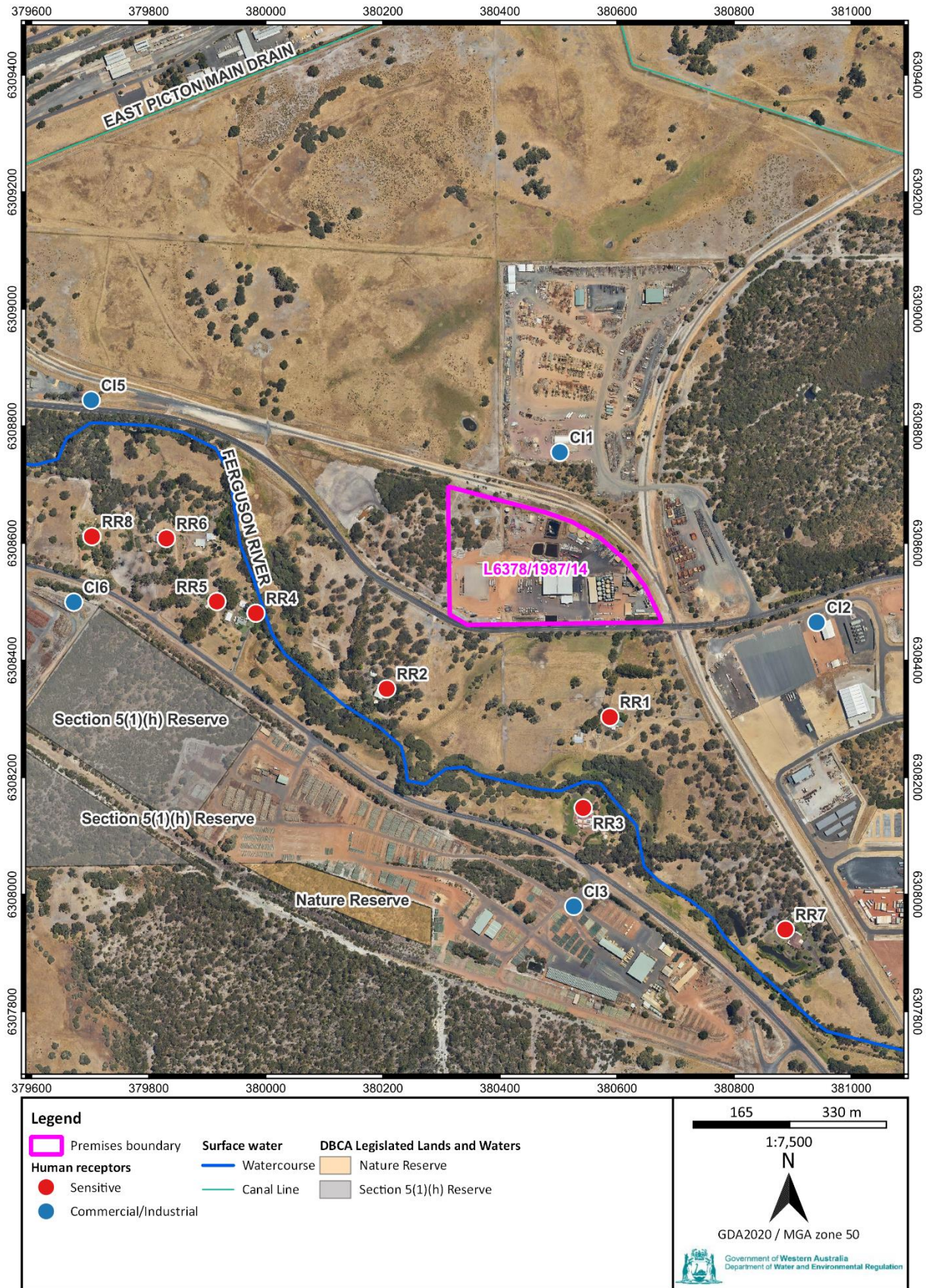


Figure 1: Potential receptors surrounding the premises

Table 4. Risk assessment of potential emissions and discharges from the premises during works and operation

Risk Event					Licence Holder's controls	Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors						
Works									
Decommissioning and removal of tank farms and ancillary buildings Construction of main tank farm extension	Dust	Pathway: Air/windborne pathway Impact: Health and amenity	Human receptors listed in Table 3	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	N/A	N/A	
	Noise			Refer to Section 3.1	C = Slight L = Possible Low Risk	Y	The Environmental Protection (Noise) Regulations 1997 apply		
Odour	Refer to Section 3.1			C = Slight L = Unlikely Low Risk	Y	Condition 18: Table 11 – Phase 3	N/A		
Decommissioning and removal of tank farms	Hydrocarbons and contaminated stormwater	Pathway: Overland runoff Impact: Ecosystem disturbance or impact to water quality	TEC Native vegetation Ferguson River	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	Condition 18: Table 11 – Phase 3	N/A	
		Pathway: Seepage through soil to groundwater and migration in groundwater Impact: Soil contamination, ecosystem disturbance or impact to water quality	Underlying groundwater TEC Native vegetation Ferguson River Unnamed CALM Act s.5(1)(h) timber reserve						
Operation									
Transfer of hydrocarbons between trucks and tank farm extension Storage of hydrocarbons in tank farm extension	Odour	Pathway: Air/windborne pathway Impact: Health and amenity	Human receptors listed in Table 3	Refer to Section 3.1	C = Minor L = Possible Medium Risk	Y	Condition 1: Table 1 Condition 18: Table 11 – Phase 3	Existing licence conditions and licence holder proposed controls are considered sufficient.	
Spills, leaks, overflows or containment failures from the tank farm extension, pipelines and oily water separator	Hydrocarbons and contaminated stormwater	Pathway: Overland runoff Impact: Ecosystem disturbance or impact to surface water quality	TEC Native vegetation Ferguson River	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Condition 1: Table 1 Condition 18: Table 11 – Phase 3	Existing licence conditions and licence holder proposed controls are considered sufficient.	
		Pathway: Seepage through soil to groundwater and migration in groundwater Impact: Soil contamination, ecosystem disturbance or impact to water quality	Underlying groundwater TEC Native vegetation Ferguson River Unnamed CALM Act s.5(1)(h) timber reserve						

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Discharge of treated stormwater to swale drain	Potentially contaminated stormwater	Pathway: Overland runoff Impact: Ecosystem disturbance or impact to surface water quality	TEC Native vegetation Ferguson River	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Condition 1: Table 1 Condition 18: Table 11 – Phase 3	Existing licence conditions and licence holder proposed controls are considered sufficient.
		Pathway: Seepage through soil to groundwater and migration in groundwater Impact: Soil contamination, ecosystem disturbance or impact to water quality	Underlying groundwater TEC Native vegetation Ferguson River Unnamed CALM Act s.5(1)(h) timber reserve					

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk assessments* (DWER 2020).

Note 2: Proposed Licence Holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

4. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
Shire of Dardanup advised of proposal (18 October 2024)	The Shire of Dardanup provided the following response on 7 November 2024: We would like to advise that this licence amendment is in line with development approval DAP-F0405001 issued on 2 August 2024. The shire has no further comments.	Noted.
City of Bunbury advised of proposal (18 October 2024)	The City of Bunbury provided the following response on 12 November 2024: Whilst Wren Oil operates over lots both within the City of Bunbury and the Shire of Dardanup, the proposed modifications to their licencing only relates to the land contained within the LGA boundaries of Dardanup. No works or modifications are proposed within the City's land that would require planning approval. The proposal is consistent with the City of Bunbury Local Planning Scheme No.8 and there are no objections from a planning perspective. The City also does not have any comments from an environmental perspective.	Noted.
Licence Holder was provided with draft amendment on 20 December 2024	Refer to Appendix 1	Refer to Appendix 1

5. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a revised licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

5.1 Summary of amendments

Table 6 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the revised licence as part of the amendment process.

Table 6: Summary of licence amendments

Condition no.	Proposed amendments
Expiry Date:	To assist with administration of annual fees, the expiry date of the licence was extended from 11 September 2026 to 2 September 2027. This aligns the expiry date of the licence to the end of the annual fee period.

Condition no.	Proposed amendments
1: Table 1 (was 5 and 6: Table 4)	Removed references to tank farm south, tank farm shed and other decommissioned infrastructure. Updated the number of oil water separators to four. Updated the naming of the irrigation area to drainage swale and removed reference to cut off drains.
Former conditions 11, 12, 13, 14 and 15	Removed redundant conditions relating to seepage rate testing and reporting. These requirements had been previously completed in 2018 (DWER reference: FA238632).
4: Table 4 (was 1: Table 2)	Removed reference to the decommissioned chainbar oil heater stack and updated the naming of the irrigation area to drainage swale.
5: Table 5 (was 22: Table 12)	Updated the naming of the irrigation area to drainage swale.
18: Table 11 (was 2: Table 3)	Added requirements allowing controlled works to construct the main tank farm extension to the table.
Definitions	Redundant definitions no longer used in the licence were removed from the table.
Schedule 1: Figure 1	Replaced by the updated version of Figure 1 provided by the Licence Holder.
Schedule 1: Figure 2	Replaced by the updated version of Figure 2 provided by the Licence Holder.
Schedule 1: Figure 3	Included new figure provided by the Licence Holder showing the main tank farm extension layout.
Schedule 1: Figure 4	Included new figure provided by the Licence Holder showing the main tank farm extension concrete bunding arrangement.
Schedule 2	Removed references to tank farm south and tank farm shed, and updated the naming of the irrigation area to drainage swale in the infrastructure and equipment table.

Table 7: Consolidation of licence conditions in this amendment

Existing condition	Condition summary	Revised licence condition	Conversion notes
N/A	Interpretation	Interpretation	Revised to current licensing format.
N/A	Definitions	Definitions Table 12	Revised to current licensing format. Redundant definitions removed.
1 and Table 2	Emissions	4 and Table 4	Partially redundant condition. Revised to current licensing format.
2 and Table 3	Construction of infrastructure	18 and Table 11	Revised to current licensing format.
3	Reporting of Phase 1 works	19 and 20	Merged and revised to current licensing format.
4	Reporting of Phase 2 works		
5 and Table 4	Infrastructure and equipment requirements	1 and Table 1	Merged and revised to current licensing format.
6 and Table 4	Infrastructure and equipment maintenance		

Existing condition	Condition summary	Revised licence condition	Conversion notes
7 and Table 5	Waste acceptance limits	2 and Table 2	Merged and revised to current licensing format.
8 and Table 6	Controlled waste types		
9 and Table 7	Waste management and processing	3 and Table 3	Revised to current licensing format.
10	Spills and leaks	6	Updated numbering.
16 and Table 9	Monitoring of air emissions	7 and Table 6	Merged and revised to current licensing format.
17	Recording of air emissions monitoring		
18 and Table 10	Monitoring of groundwater	9 and Table 8 10(a) and 10(b)	Revised to current licensing format.
19	Water sample collection method	Table 7 and Table 8	Redundant condition removed. Revised to current licensing format where the method is included in the monitoring requirements table.
20	NATA accreditation	10(c)	Revised to current licensing format.
21 and Table 11	Treated stormwater monitoring	8 and Table 7 10(a)	Revised to current licensing format.
22 and Table 12	Treated stormwater emission limits	5 and Table 5	Revised to current licensing format.
23 and Table 13	Monitoring of inputs and outputs	11 and Table 9	Revised to current licensing format.
24	Accurate and auditable books	13 and 14	Revised to current licensing format.
25	Complaints records	12	Revised to current licensing format.
26	Annual Audit Compliance Report	15	Revised to current licensing format.
27 and Table 14	Annual Environmental Report	16 and Table 10	Revised to current licensing format.
28	Department request	17	Updated numbering.
Schedule 2: Primary Activities	Primary Activity table	Cover page of licence	Revised to current licensing format. Moved to the Prescribed Premises Category table on the licence cover page.
	Infrastructure and equipment and site layout	Schedule 2: Key infrastructure	Slight change to wording and format

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.

Appendix 1: Summary of Licence Holder's comments on risk assessment and draft conditions

Condition	Summary of Licence Holder's comment	Department's response
1 - Table 1: Row 2(b)(i)	Please remove the dehydrator and centrifuge. As per the application, this equipment is no longer present on site.	Removed. This change was overlooked in the draft.
8 - Table 7: Method	AS/NZS 5667.10 is for wastewater which may not be appropriate for stormwater. Stormwater would be more in line with surface water, but it is understood that there is not a surface water specific guideline. Possibly consider re-wording this and Table 8 method to "In accordance with industry standards and guidelines".	AS/NZS 5667.10 was considered the most relevant method due to the stormwater being treated through oil water separators. Stormwater effluent from the separators is considered a wastewater stream.
Table 11: Phase 2	As a general clarification we are interested in why the decommissioning of the Thin Film Evaporator and Front End Distillation Plant was not removed from the licence given the decommissioning works have been completed.	Decommissioning of the Thin Film Evaporator and Front End Distillation Plant were not removed from Table 11, as the compliance report for the Phase 2 works has not yet been submitted. The Phase 2 decommissioning works were retained so that they are still captured by the associated compliance reporting condition.