

**NT EPA Compliance Activity Plan  
January 2015 - June 2016**

[February 2015]  
Version 1.0

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## 1 Foreword

This compliance activity plan provides for the delivery of compliance to control pollution across the Territory by the Northern Territory Environment Protection Authority (NT EPA).

The NT EPA works in partnership with the Northern Territory community to ensure the Territory's natural heritage, and its values, both tangible and intangible, are protected. Our vision of environmentally sustainable development in the Northern Territory leads to annual compliance planning. Our purpose is to be an effective, independent and influential authority on environmental management and regulation.

*The Northern Territory Environment Protection Authority (NT EPA) has prepared this document in good faith, exercising all due care and attention, but no representation or warranty, express or implied, is made as to the relevance, completeness or fitness for purpose of this document in respect of any particular user's circumstances. Users of this document should satisfy themselves concerning its application to their situation and, where necessary, seek expert advice.*

### Acknowledgement

The NT EPA wishes to acknowledge that it has based this document on the Victoria Environment Protection Authority Annual Compliance Plan 2014 - 2015. The NT EPA wishes to thank EPA Victoria for its permission to reproduce publication number 1572 with appropriate modifications to suit the Northern Territory statutory and regulatory environment.

## 2 Objectives

The objective of this plan is to protect the environment by:

- ensuring that duty holders are compliant with environmental legislation.
- gathering intelligence on potentially polluting activities and pollution incidents.

This plan provides information and advice on how the NT EPA will achieve these objectives.

## 3 Legislation

The NT EPA is the administering authority for:

- the *Waste Management Pollution Control (WMPC) Act*
- Section 72 of the *Water Act*
- the *Marine Pollution Act*
- the *Environment Protection (Beverage Containers and Plastic Bags) (EP(BC&PB)) Act*.

### 3.1 WMPC Act

The WMPC Act provides for the protection of the environment through encouragement of effective waste management and pollution prevention and control practices and for related purposes. The WMPC Act provides for the regulation of listed waste handling activities.

### **3.2 Water Act**

The *Water Act* provides for the granting of waste discharge licences for discharges to water that would otherwise be considered an offence under the *Water Act* i.e. for waste to come into contact with water or for water to be polluted.

### **3.3 Marine Pollution Act**

The *Marine Pollution Act* protects the marine and coastal environment by minimising intentional and negligent discharges of ship-sourced pollutants into coastal waters, and for related purposes. The NT EPA is delegated the powers and functions to regulate and administer the *Marine Pollution Act*.

### **3.4 EP(BC&PB) Act**

The EP (BC&PB) Act provides the legal framework for the Northern Territory Container Deposit Scheme (CDS) and Plastic Bag Ban. The object of the EP (BC&PB) Act is to minimise environmental pollution through the establishment and regulation of these programs. The CDS is implemented through the issuing of approvals to operate under the Act.

## 4 Regulatory approach

In developing this plan the NT EPA has applied a holistic regulatory approach as represented in the NT EPA operating model (Figure 1).

The NT EPA will monitor our compliance levels, encourage higher performance, and educate business and the community about our legal obligations. The NT EPA will set standards for a productive and liveable Territory and support compliance by providing timely and relevant advice and by making our expectations clear.

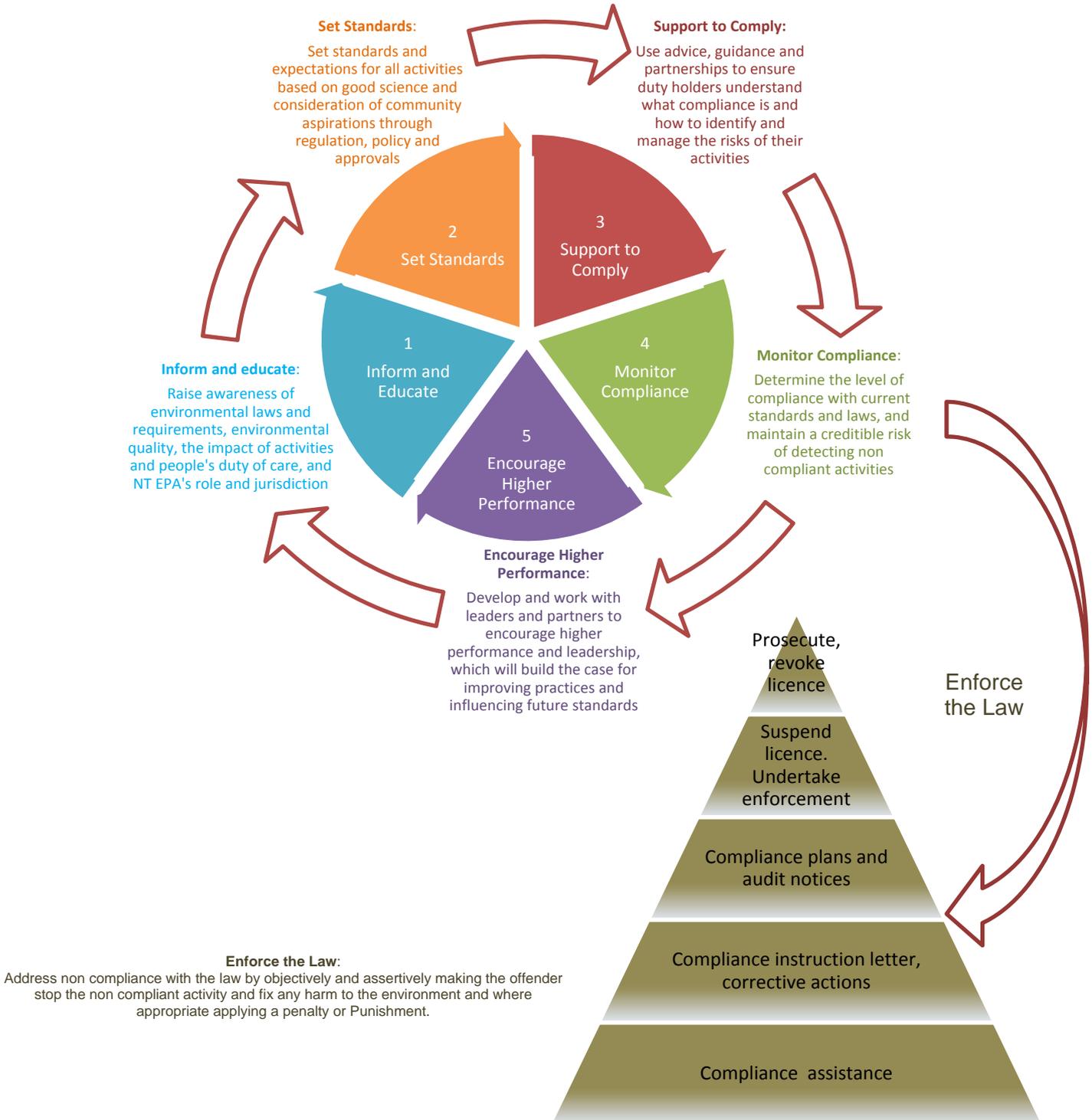


Figure 1: NT EPA regulation model approach

## 5 Overview of activities for January 2015 – June 2016

The NT EPA compliance activities fall under three categories: strategic projects, compliance maintenance and pollution response (Figure 2).

Officers across the NT EPA will allocate time to achieve compliance outcomes using engagement, targeted campaigns and collaborative approaches where applicable.

In 2015 – June 2016:

- 40% of our work will be directed towards strategic compliance activities.
- 30% of our work will be allocated to maintaining compliance oversight of regulatory instruments including: licences, notices, directions and programs regulated by the NT EPA.
- 30% of our work will be allocated to responding to pollution incidents.



Figure 2: Planned proportion of the NT EPA compliance and enforcement work in 2015 - June 2016.

We recognise it is not possible to predict all compliance and enforcement requirements at the beginning of the year. The overall allocation will be reassessed through the year to account for any changes in priorities or resources.

## 6 Strategic projects

Strategic activities aim to address complex potential environmental harm or resolve long-standing priority compliance issues. In conducting these activities, the NT EPA will liaise with other regulatory bodies and stakeholders across the Territory.

The NT EPA will target seven areas that complement the NT EPA's 2013 - 2016 strategic plan:

1. Contaminated sites
2. Pollutants entering stormwater in the Darwin Harbour region
3. Waste strategy
4. Construction and development sites
5. Remote landfills
6. Environmental risk assessment tools
7. Container Deposit Scheme.

NT EPA works are not limited to the targeted areas, however a prioritised process allows for a coordinated and integrated approach to better manage NT EPA operations.

### 6.1 Contaminated sites

Contaminated sites have the potential to impact human health and the environment with a range of severity. The NT EPA will develop guidelines and factsheets that inform land owners and developers about how the NT EPA will regulate contaminated sites under the WMPC Act and in accordance with the *National Environment Protection (Assessment of Contaminated Sites) Measure*.

In regulating contaminated sites the NT EPA may require duty holders to assess and remediate potentially contaminated sites or contaminated sites by issuing a statutory instrument (or notice). These notices will remain in place until the contamination is cleaned up or managed to an acceptable standard.

The NT EPA will inspect sites subject to notices and initiate follow-up action where non-compliances are identified. As part of all inspections, the NT EPA will be gathering information to assess each site's potential risk to human health and the environment. This will allow us to focus on the sites that pose the greatest risk.

There are currently four sites subject to a notice relating to site contamination. All four of these sites have been remediated and are subject to ongoing management requirements.

**Target**      **Complete guidelines for the regulation of contaminated sites.**

**Complete inspections of four sites subject to notices plus inspect any newly reported sites.**

### 6.2 Stormwater strategy

The *Northern Territory Stormwater Strategy for the Darwin Harbour Region* was released in August 2014 as per the NT EPA Strategic Plan's 2013 - 2016 goals to address priority environmental issues.

In support of this strategy the NT EPA will undertake an active monitoring and enforcement program in collaboration with local authorities. The NT EPA will respond to

reports of stormwater pollution incidents in consultation with local authorities and other government agencies.

The NT EPA will develop factsheets and guidelines relating to stormwater quality. More information on the stormwater strategy can be found at:

<http://www.ntepa.nt.gov.au/about-nt-epa/publications/publications>

### 6.3 Waste strategy

The Waste Management Strategy for the Northern Territory is due for release in early 2015. The strategy will provide a basis for understanding and improving the management of waste across the Northern Territory to reduce the generation of waste, increase rates of resource recovery and to minimise environmental impacts caused by waste.

In support of this strategy the NT EPA will develop a series of implementation plans in consultation with the broader community, industry, government agencies and local and regional councils. Implementation plans will cover areas such as specific projects to improve rates of resource recovery, manage high risk landfills, plan for future and emergency waste and engaging with different stakeholders to improve waste management outcomes in the Northern Territory.

Once finalised more information on the strategy can be found at:

<http://www.ntepa.nt.gov.au/about-nt-epa/publications/publications>

### 6.4 Construction and development sites

In 2013 - 2014 the NT EPA received an increasing number of complaints relating to activities conducted at construction and development sites and their impacts on the surrounding environment. In response, the NT EPA is committed to developing appropriate environmental guidelines for the industry to ensure that duty holders are aware of their lawful obligations.

**Target: Guidelines for Construction and Development Sites published.**  
**Site inspections on 20 construction and development sites.**

### 6.5 Remote landfills

In line with the recommendations from the NT Waste Management Strategy, the NT EPA will assess remote landfills across the Territory to determine their classification under the Act, and to identify risks posed to human and environmental health. Education delivery will be designed to ensure landfill operators are aware of their obligations under the Act and have the resources required to better manage their waste and resources. Where required, environment protection licences will be negotiated with operators to ensure performance is regulated by the NT EPA.

**Target: Conduct site inspections of five remote landfill sites.**  
**New licences are issued for three remote landfill sites.**

### 6.6 Environmental risk assessment

A risk based approach to compliance ensures the NT EPA allocates resources to those areas with the potential to cause the greatest harm, where the biggest differences can be made, and where the biggest risks to the environment or natural assets can be managed. A responsive model ensures the effective regulation of those tasks.

Responsiveness means that the NT EPA chooses the right compliance or enforcement tool to achieve the best outcome.

The NT EPA is aware that information to evaluate environmental risk for activities in the Territory is limited. Targeted inspections of legacy mine sites, unlicensed sites and other potentially polluting activities including concrete batching facilities that are not subject to licensing requirements under the WMPC Act or *Water Act* will be inspected under this plan.

Information gathered during these inspections will provide source terms for developing a tool for assessing environmental risk. The NT EPA will use this environmental risk assessment tool to inform future compliance activity plans.

**Target**      **Conduct site inspections of 15 sites where potentially polluting activities occur (including legacy mine sites).**

**Develop an environmental risk assessment tool.**

## 6.7 Container Deposit Scheme

On 30 June 2014 legislative amendments came into force to improve the functionality of the *Environment Protection (Beverage Container and Plastic Bags) Act*. Transitional matters under Part 7 will direct compliance activities for the Container Deposit Scheme (CDS) in the next 12 months.

Activities that align with legislative changes and support associated changes to CDS will include timely advice, guidance and partnerships to support industry compliance, compliance monitoring, working with industry to encourage improved functionality of CDS, awareness raising about the legislation and NT EPA's role and jurisdiction, and timely issuing of all regulatory approvals under the Act.

**Target**      **Re-issue approvals to all CDS coordinators**

**Re-issue approvals to all CDS collection depots (subject to the re-issuing of CDS Coordinators)**

## 7 Compliance maintenance

Any person or entity is accountable to the NT EPA and the public for the prevention and minimisation of negative impacts on the environment.

The NT EPA uses its powers (where applicable) to issue statutory instruments, such as licences, approvals and notices, to duty holders to ensure that their activities do not harm the environment. The NT EPA will monitor compliance with these instruments to ensure that risks to the environment are being managed appropriately, while maintaining the NT EPA's regulatory oversight and protecting the integrity of the statutory system.

Compliance maintenance activities will ensure a level playing field for operators who do the right thing.

### 7.1 Licences and approvals

The NT EPA issues licences and approvals for activities that pose an environmental risk and are scheduled under the WMPC Act. Under the EP(BC&PB) Act approvals are issued for beverage suppliers, collection depots and coordinators to operate the Container Deposit Scheme (CDS).

All licences and approvals are subject to conditions which must be complied with in undertaking the licensed or approved activity.

The NT EPA currently administers 80 approvals and licences under the WMPC Act.

The NT EPA issued 389 supply approvals in 2013 - 2014 under the EP(BC&PB) Act

Then NT EPA currently administers five CDS coordinator approvals under the EP(BC&PB) Act and approvals for nine CDS collection depots that are open to the public.

The NT EPA will monitor and assess compliance with licences and approvals.

### 7.1.1 Annual returns

Generally, licence conditions require the licensee to submit an annual return (or Annual Audit and Compliance Report) for each year of the licence.

The annual return is the way licence holders publicly report their environmental performance. The annual return is a public declaration of the licence holder's performance against licence conditions in the previous year. The NT EPA will conduct a preliminary desktop review of all annual returns that are submitted.

The NT EPA uses information from annual returns as a source of intelligence leading to targeted licenced inspections. This may occur on an individual level, such as repeated non-compliances that need to be remedied, or on a broader level which targets action in certain sectors or specific conditions.

There are approximately 104 annual returns expected to be submitted during the period of this plan.

|               |  |
|---------------|--|
| <b>Target</b> | <b>Conduct desktop review 104 annual returns.</b>                              |
|               | <b>Conduct 30 targeted licence inspections.</b>                                |
|               | <b>Administer 111 licences and approvals under the WMPC Act and Water Act.</b> |
|               | <b>Administer 403 approvals under the EP(BC&amp;PB) Act.</b>                   |
|               | <b>Table annual report as required under the EP(BC&amp;PB) Act.</b>            |

## 7.2 Notices

The NT EPA employs a range of notices and tools (listed below) to effectively address non-compliance and to remedy and make good the harm caused by breaches or potential breaches, of environmental legislation. These notices generally have conditions to which the recipient must comply with. The NT EPA will monitor compliance with the conditions contained in these notices.

|               |   |
|---------------|---|
| <b>Target</b> | <b>Conduct desktop review of all notices issued from January 2015 to June 2016.</b> |
|               | <b>Conduct 15 site inspections for premises subject to notice.</b>                  |

### 7.2.1 Compliance improvement letter

A compliance improvement letter may be issued when evidence of an offence or improvement on environmental practice is warranted. In general terms, the offence is likely to be minor in nature and enforced effectively by remediation and avoiding regulatory enforcement action.

A compliance improvement letter serves to advise the recipient that an activity they are undertaking may be considered a breach of legislation. A compliance letter will generally identify the specific activity, how this activity may be considered a breach under legislation and the penalties that may apply.

A compliance improvement letter may require the recipient to provide a response and present evidence in support of their action. A response to a compliance improvement letter should include any mitigating factors that may have contributed to the potential offence.

The NT EPA will consider the information provided in response to a compliance improvement letter to determine what, if any, further compliance or enforcement action will be taken.

Compliance improvement letters will provide a source of intelligence for targeting future compliance activities.

#### **7.2.2 Notice to carry out an environmental audit program**

The NT EPA or a court may require, by notice in writing, an environmental audit program to be carried out.

The environmental audit program will specify the audit to be performed including the activities, operations, premises or location that the audit relates to. The program will contain a timeline of dates or frequency with which the audits are to be performed and the dates or frequency that results of the audits are to be submitted to the NT EPA.

A notice to carry out an environmental audit program may specify conditions or other matters relating to the conduct of the environmental audit program.

#### **7.2.3 Authorised officer direction**

Authorised officers have extensive investigative powers including being able to enter and search land, take photographs, take samples and issue directions regarding the prevention, control or clean up of pollution or environmental harm.

An authorised officer direction is generally issued in writing. Where an authorised officer issues a verbal direction this will be followed up with a written direction. A direction will specify why the authorised officer is issuing the direction and conditions or actions that the recipient must comply with. A verbal direction will be issued in situ when immediate actions are required to address pollution.

It is an offence not to comply with the requirements of an authorised officer direction.

#### **7.2.4 Pollution abatement notice (PAN)**

Under the WMPC Act, the NT EPA can issue a pollution abatement notice (PAN) to a person who the NT EPA believes on reasonable ground has committed or may commit an offence, or has contravened or failed to comply with their general environmental duty, or who is the owner or occupier of land that is polluted.

A PAN may require a person within a specified time to comply with the provision of the WMPC Act, prevent pollution or take remedial action to clean up polluted land to a specified condition.

PANs are issued to address pollution matters that may require time to address.

It is an offence not to comply with the requirements of a PAN.

#### **7.2.5 Compliance plan**

The purpose of a compliance plan is to enable compliance with a provision of the WMPC Act regulations or of an environmental protection objective. A compliance plan implements stages of improvement in waste management and prevention, reduction, control, rectification or clean up of pollution or environmental harm resulting from pollution. A voluntary compliance plan may be submitted, or a plan may be required by the NT EPA or a court order.

The NT EPA will monitor a compliance plan to ensure that the plan is implemented.

It is an offence not to comply with a compliance plan.

#### 7.2.6 Performance agreement

A performance agreement is an agreement to protect, restore or enhance the environment or to improve waste management or the prevention, reduction control rectification or clean up of pollution or environmental harm resulting from pollution. The NT EPA may provide assistance relating to the performance of the agreement.

The NT EPA may enter into a performance agreement with a person who conducts an activity that causes, or is likely to cause pollution resulting in environmental harm, or generate waste. A performance agreement may be entered with the owner or occupier of land that is polluted.

The NT EPA will monitor performance agreements to ensure that the agreement is implemented.

A performance agreement has the effect of a contract binding on the Territory.

### 7.3 National Pollutant Inventory (NPI) facilities

The NPI is a federally administered internet database which provides the community, industry and government with free information about emissions and transfers of 93 toxic substances. The National Pollutant Inventory (NPI) was established under the National Environment Protection (National Pollutant Inventory) Measure (NPI NEPM).

NPI reporting thresholds are based on substance usage, fuel or waste combustion or emissions and transfers of substances. Owners of facilities exceeding the given thresholds must provide a report within three months of the end of the reporting period.

The NPI is an environment protection objective of the WMPC Act allowing authorised officers powers to implement the NPI under the WMPC Act.

The NT EPA will monitor NPI facilities to ensure they are meeting their reporting requirements.

There are currently 110 NPI facilities in the Territory.

**Target**      **Inspect ten NPI facilities.**

## 8 Pollution Response

Pollution response activities are reactive and focus on minimising harm from pollution events. Inspections relating to a pollution report aim to identify the source of the pollution and, if warranted, take compliance action.

Pollution response activities are inspections and other assessments that aim to address environmental pollution identified through reports of pollution made by the public, emergency incident notifications, duty holder notifications, co-regulator reports or other information sources. The NT EPA receives pollution reports and notifications on the Pollution Hotline 1800 064 567 and by email to [pollution@nt.gov.au](mailto:pollution@nt.gov.au).

The NT EPA conducts a risk-based assessment of reports to ensure that we respond appropriately. The assessment considers the risk to the environment and other potential impacts, and the likelihood that NT EPA officers will find the pollution, detect the source and address the issue. Based on the outcome of this assessment, an authorised officer may conduct an inspection, work with co-regulators to address the issue, or log the report to contribute to future intelligence.

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During a response inspection, authorised officers will determine if pollution is occurring and the source by tracing the pollution back to a source. If the situation is not resolved immediately, an authorised officer may issue a notice to fix the problem.

### Target

Respond to an expected 500 reports of pollution.

## 9 Preparing for a visit from the NT EPA

All businesses are responsible for operating in accordance with the conditions of their licence or approval and within the law. The NT EPA conducts inspections both announced and unannounced at sites throughout the Territory.

You may receive a visit from the NT EPA if your activities relate to one or more of the following circumstances:

- You are a licence or approval holder
- You have been issued with a direction or notice
- You report under the NPI
- You are involved as a result of a response to a report of pollution
- You operate within an industry identified as one of the strategic projects 2014 – 2015.

Below is a list of the types of actions you can take to prepare for a visit from the NT EPA.

### **Be familiar with your responsibilities**

1. Make sure you are familiar with section 12 of the WMPC Act and the conditions of your licence or approval, if appropriate.
2. Be familiar with industry codes of practice that relate to your industry or to relevant site operations.
3. Know where your liquid wastes go and what is connected to your stormwater.
4. Be aware of any approvals that your business may require. For example, expanding operations; adding to or upgrading equipment; increasing the volume of waste generated.

### **Put in place environmental monitoring and management systems**

5. Identify risks posed to the environment from your site's operations, put suitable controls in place to manage them and document these controls. If necessary, seek professional advice.
6. Ensure you have a documented monitoring program in place that allows you and the NT EPA to know if you are not complying with your licence, approval or the law. This can include regular sampling programs, leak detection mechanisms, or a program to regularly assess amenity impacts to surrounding communities or receptors. If necessary, seek professional advice.
7. Have a system in place to know if and when your site's operation has amenity impacts on the surrounding community. Have a process in place to manage any issues quickly.
8. Closely monitor any storage or liquid transportation systems that are below ground to avoid leaks going undetected and impacting on land or groundwater.
9. Make sure that you keep all monitoring records on site.

### Maintain good practices

10. Store, manage and dispose of waste properly so that it does not impact the environment. Ensure that any subcontractors you are using for disposing of waste are operating within the law and associated guidelines.
11. Ensure that any stormwater drains are clear of debris and that no waste from your site enters the stormwater system.

### Communicate with the NT EPA

12. If you suspect you might be non-compliant with your licence, approval or the law, or at risk of being non-compliant with a remedial notice, immediately notify the NT EPA. The NT EPA will consider any notifications when determining further action or sanction.
13. If you are aware of operators in your industry who are not complying with the law, or are causing environmental harm, contact the NT EPA as soon as possible with as much detail as possible.
14. If you are in doubt, or have any questions on the above, call the NT EPA on **08 8924 4218**, or to report pollution incidents call **1800 064 567** or email [pollution@nt.gov.au](mailto:pollution@nt.gov.au).

## 10 How we measure our performance

Targets have been set throughout this compliance activity plan and are summarised in Table 1. We will monitor our performance throughout the year so that we know we are meeting the set targets.

We will measure the number of enforcement actions we take and the number of pollution hotline calls we receive. We will monitor these numbers year to year to identify opportunities to improve the way we perform our regulatory role.

NT EPA objectives will be measured by the following outcomes:

1. Number of inspections completed
2. The number of enforcement actions conducted including:
  - a. Compliance improvement letters
  - b. Notices to carry out an environmental audit program
  - c. Authorised officer directions
  - d. Penalty infringement notices (PIN)
  - e. Pollution Abatement Notices (PAN)
  - f. Compliance plans
  - g. Show cause notices under the EP(BC&PB)Act
  - h. Quarterly reporting within the CDS
  - i. Performance agreements
  - j. Prosecutions
3. The number of pollution hotline calls received that might relate to a particular matter

4. Timeliness of response and resolution of environmental issues
5. Actual environmental problems resolved.

Table 1: Targeted goals to measure NT EPA activities

|                           | Activity area                                  | Target  |
|---------------------------|--|---|
| <b>Strategic projects</b> | Contaminated sites                             | Complete guidelines and factsheets for the regulation of contaminated sites<br><br>Complete inspections of four sites subject to notices.                               |
|                           | Stormwater strategy                            | See<br><br><a href="http://www.ntepa.nt.gov.au/about-nt-epa/publications/publications">http://www.ntepa.nt.gov.au/about-nt-epa/publications/publications</a>            |
|                           | Waste strategy                                 | Once final see<br><br><a href="http://www.ntepa.nt.gov.au/about-nt-epa/publications/publications">http://www.ntepa.nt.gov.au/about-nt-epa/publications/publications</a> |
|                           | Construction and development sites             | Conduct site inspections on 20 construction and development sites   |
|                           | Remote landfills                               | Conduct site inspections of five remote landfill sites<br><br>Five unlicensed landfill sites are licensed   |
|                           | Environmental risk assessment                  | Conduct site inspections of 15 legacy mine sites or other potentially contaminating activities.<br><br>Develop an environmental risk assessment tool                    |
|                           | Manage changes to the Container Deposit Scheme | Re-issue approvals to all CDS coordinators<br><br>Re-issue approvals to all CDS collection depots (subject to re-issuing of approvals to CDS Coordinators)              |
|                           | <b>Compliance maintenance</b>                  | Licences and approvals  |
| Notices                   |  | Conduct desktop review of all notices issued in 2014 - 2015<br><br>Conduct 15 site inspections for premises subject to notice   |
| NPI                       |  | Conduct 10 inspections on NPI facilities  |
| <b>Pollution response</b> | Pollution hotline response to activities       | Respond to 500 reports of pollution   |