

# Environmental Baseline and Lease Expiry Guideline

Function: Approvals, Environment and Heritage

- 1 Introduction.....3
  - 1.1 Purpose and Scope.....3
  - 1.2 PAPL Roles and Responsibilities .....3
- 2 Components of Baseline Environmental Assessment Report.....4
  - 2.1 Background.....4
    - 2.1.1 Purpose and Scope .....4
    - 2.1.2 Description of Tenant's Proposed Activities .....4
  - 2.2 Site Description .....4
    - 2.2.1 Site Location.....4
    - 2.2.2 Description of the Site .....4
  - 2.3 Environmental Context .....4
    - 2.3.1 Existing Environmental Conditions.....4
    - 2.3.2 Desktop Review .....4
    - 2.3.3 Site Walkover .....5
    - 2.3.4 Environmentally Sensitive Receptors .....5
  - 2.4 Environmental Aspects and Impacts .....5
  - 2.5 Legal and Regulatory Requirements.....5
    - 2.5.1 Applicable Environmental Laws and Regulations.....5
    - 2.5.2 Airport Specific Requirements .....5
  - 2.6 Baseline Environmental Data Collection.....5
    - 2.6.1 Methodology for Data Collection.....5
    - 2.6.2 Summary of Data Collected.....5
    - 2.6.3 Data Analysis and Interpretation .....6
  - 2.7 Environmental Risks and Mitigation Measures .....6
  - 2.8 Conclusion and Recommendations .....6
  - 2.9 References and Appendices .....7
- 3 Lease Expiry .....8
  - 3.1 Components of Lease Expiry Environmental Assessment Report.....8
  - 3.2 Lease Expiry Site Inspection.....8
  - 3.3 Environmental Documentation .....8
- 4 Legislative Context.....9
- Disclaimer .....11

5 Definitions and Acronyms.....12

6 Related Documents .....12

Appendix 1 - Vacating Tenant Environmental Inspection Checklist .....13

**Document Information**.....14

**Authority Table**.....14

**Version, Status and Approval Log**.....14

# 1 Introduction

The Perth Airport estate (the estate) covers a total of 2,105 hectares in Perth, Western Australia (WA). In addition to aviation-related activities, the estate also comprises of over 200 tenants across over 600 leases. Tenant operations cover a wide range of activities, including retail, commercial, industrial, logistics, etc. Tenants must adhere to regulatory requirements, lease agreements and the airport's operating standards and procedures, which cover environmental responsibilities and day-to-day operations. The Commonwealth Airport (Environment Protection) Regulations 1997 provides the legislative context for tenant operations on the estate. Notably, the Regulations set out requirements such as establishing systems, environmental monitoring, reporting, enabling access to the premises or documentation, as well as pollution management clauses. The applicable extracts from the Regulations are provided in Section 4.

## 1.1 Purpose and Scope

This document is for use by Perth Airport Pty Ltd's (PAPL) Tenants as a guide for undertaking Baseline Environmental Assessment (BEA) and Lease Expiry Environmental Assessment (LEEA).

The term "Baseline Environmental Assessment" denotes the environmental site assessment that is required to identify environmental conditions at the commencement of a lease/operations by the Tenant.

The environmental site assessment that is carried out at the end of a lease is termed as "Lease Expiry Environmental Assessment". The purpose of carrying out LEEA is to evaluate the condition of the leased premises upon the Tenant's departure and ensure that the premises comply with all environmental regulations. This assessment will also identify any necessary remediation or mitigation actions to address potential environmental concerns contributed during the Tenant's operations.

The BEA and LEEA must be conducted by a suitably qualified environmental consultant who has appropriate qualifications and experience in identification of potentially contaminating activities.

If BEA is conducted as a part of lease renewal, supplemental site investigation or detailed site investigation (DSI) may be requested to reassess and/or delineate previously identified contamination.

Perth Airport estate is under federal jurisdiction, so the *WA Contaminated Sites Act 2003* does not strictly apply. However, investigation requirements are based on the WA Department of Water and Environment and Regulation (DWER) Contaminated Sites guidance documents, adapted to suit conditions and circumstances at the Airport.

## 1.2 PAPL Roles and Responsibilities

The initial point of contact for BEA and LEEA is the Tenants' PAPL Asset Manager. Reports are provided to a member of the PAPL Approvals, Environment and Heritage (AEH) team for technical review and any subsequent associated technical engagement, copying the Asset Manager.

## 2 Components of Baseline Environmental Assessment Report

The following minimum reporting requirements must be addressed as part of the BEA report.

### 2.1 Background

Brief description of circumstances of engagement, and reasons for investigation.

#### 2.1.1 Purpose and Scope

Outline the purpose of the baseline assessment, including identifying environmental conditions prior to the commencement of each new lease or development activity.

Add a brief outline of the scope of the assessment, specifying items excluded from scope where appropriate. Key considerations should include why the assessment has been prepared, what it covers, whose activities it manages, and what the assessment contains.

#### 2.1.2 Description of Tenant's Proposed Activities

Provide a summary of the Tenant's planned operations or construction activities within the premises, including any known potential environmental impacts.

### 2.2 Site Description

#### 2.2.1 Site Location

Provide a general description of the Site's location within the wider Perth Airport estate. Identify nature of neighbouring land uses. The purpose is to establish spatial context and environmental setting for the assessment by describing the physical setting, surrounding land use, and operational features within and around the Site.

#### 2.2.2 Description of the Site

A detailed description of the Tenant's leased space or operational area, including boundaries, buildings, equipment, and any associated infrastructure (such as underground storage tanks). A site layout drawing/figure should be included, which includes all pertinent features.

### 2.3 Environmental Context

#### 2.3.1 Existing Environmental Conditions

Provide an overview of the current environmental state of the site such as, geomorphology and topography, hydrology, geology and lithology, site surface conditions, stormwater and drainage systems, air quality and noise, hydrogeology, acid sulphate soils etc.

#### 2.3.2 Desktop Review

Complete a desktop review of the site, including past land use on the site and any known contamination or pollution issues. Include records of prior environmental assessments (as appendices), if applicable. This section should include desktop review of regulatory agency record search such as Australian and State Heritage Registers, Dangerous Goods Licence, etc. It should also include an assessment of historical aerial photography for the Site and surrounding area. PAPL may have historical reports or data that may be available to inform studies. Enquiries regarding any available reports or data should be directed to the PAPL AEH team and determined on a case-by-case basis.

### 2.3.3 Site Walkover

Provide a summary of the physical inspection of the site and photographs. PAPL AEH team should be contacted to confirm if PAPL representation is required at the site walkover particularly where knowledge of current or past operations may be beneficial to establishing the site condition.

### 2.3.4 Environmentally Sensitive Receptors

This section should identify and describe all environmentally sensitive receptors (ESRs) located in the area/site vicinity. ESRs should include any environmental sensitivities in the area/site and vicinity, such as ecological features (wetlands, protected areas, critical habitats, catchments, drainage lines, etc). Provide a map showing the ESR locations, detail their proximity to the Site, assess their vulnerability or sensitivity to the Site's operations.

## 2.4 Environmental Aspects and Impacts

List the potential environmental aspects related to Tenant operations. These could include, but are not restricted to, waste generation, water usage, noise pollution, emissions, energy consumption, etc. Include impact assessment where relevant. For each identified aspect, justification around determination of whether or not there is impact, as well as the level of impact, should be provided.

## 2.5 Legal and Regulatory Requirements

### 2.5.1 Applicable Environmental Laws and Regulations

Outline the key environmental regulations that apply to the Tenant's operations at the airport. Typically, because the estate is on leased Commonwealth land, the federal *Airports Act 1996* and the Airport (Environment Protection) Regulations 1997 apply in the first instance. The onus is on Tenants to identify all applicable laws and regulations and seek consultant and/or legal advice where required.

### 2.5.2 Airport Specific Requirements

List any specific guidelines, requirements, or standards set by PAPL that the Tenant must follow.

## 2.6 Baseline Environmental Data Collection

### 2.6.1 Methodology for Data Collection

Provide a detailed description of the data collection methods (e.g., soil sampling, groundwater sampling). A rationale for number of samples collected and location of samples should also be provided. Quality control requirements should be detailed. Any built infrastructure needed to collect data, such as installation of groundwater wells, requires building activity consent and approval under the Airports (Building Control) Regulations 1996.

### 2.6.2 Summary of Data Collected

Present a summary of the collected baseline data (e.g., ambient air quality, water quality, noise levels, soil test results, etc.). The preliminary investigation and initial assessment of site contamination shall consider the possibility of all forms of potential contamination based on past land use. Reports should include bore logs and well construction details where applicable.

If soil, surface water, or groundwater analysis is required as part of the BEA, the analytical suite should be selected based on the site's contamination risk profile determined from current or past land use and targeted to contaminants of potential concern (COPCs).

In the absence of confirmed potential sources of contamination and COPCs, a generic analytic suite should be adopted for all soil, surface water and groundwater assessment. The following are the recommended minimum suite of analysis for the environmental samples:

- Heavy metals (arsenic, beryllium, boron, cadmium chromium (tri- and hexavalent), cobalt, copper, lead, manganese, mercury, selenium, and zinc)
- Total recoverable hydrocarbons (TRH)
- Benzene, toluene, ethylbenzene, xylenes, and naphthalene (BTEXN)
- Polycyclic aromatic hydrocarbons (PAH)
- Organochlorine pesticides/organophosphorus pesticides (OCP/OPP)
- PFAS full suite (28 analytes).
- All the samples must be analysed by National Association of Testing Authorities (NATA) accredited laboratory. The works undertaken should be in accordance with:
  - National Environment Protection (Assessment of Site Contamination) Measure) (amended 2013) (NEPM)
  - PFAS National Environmental Management Plan 3.0 March 2025 (NEMP)
  - DWER Assessment and Management of Contaminated Sites (DWER 2021)
  - Airport (Environment Protection) Regulations 1997.

### 2.6.3 Data Analysis and Interpretation

A Tier 1 risk assessment should be undertaken as per the ASC NEPM, which includes comparison of collected data to relevant assessment criteria, including but not limited to following guidelines (as amended from time to time):

- Heads of Environment Protection Authority (HEPA) PFAS National Environmental Management Plan (NEMP Version 3.0 (2025))
- Health screening levels for petroleum hydrocarbons in soil and groundwater (CRC CARE technical report no. 10)
- Australia and New Zealand guidelines for fresh and marine water quality (ANZG, 2018)
- Protection of freshwater ecosystems (ANZG-draft, 2023)
- Perth Airport PFAS Contamination Management Plan (Aurecon, 20240)
- Airports (Environmental Protection) Regulations 1997

The findings from the Teir 1 Risk assessment should be utilised to develop a conceptual site model (CSM) to outline areas of potential environmental concerns.

## 2.7 Environmental Risks and Mitigation Measures

Identify potential environmental risks arising from Tenant activities, such as contamination, pollution, noise, etc. and propose mitigation strategies for each identified risk. Any risks identified in the baseline assessment must also be captured in the Tenants' Environmental Management Plan (EMP), along with the proposed controls and management strategies.

## 2.8 Conclusion and Recommendations

Summarise the key findings of the investigation and highlight any potential environmental concerns. Provide recommendations for further investigation, where required.

## 2.9 References and Appendices

List the sources of information used for the investigation, including regulatory documents, environmental standards, and data sources. Include any supplementary documents such as laboratory analytical reports, desktop review documents, etc.

## **3 Lease Expiry**

### **3.1 Components of Lease Expiry Environmental Assessment Report**

The report components of LEEA and BEA are essentially the same, typically including site history, environmental setting, sampling methods, sampling analysis and regulatory context, as described in Section 2.

However, the key component of the LEEA report is the Data Analysis and Interpretation section. This section must incorporate a direct comparison of analytical results from BEA (where available) and from LEEA to assess any changes in environmental conditions during the Tenant's occupancy.

Depending on the analytical results and the nature or extent of any identified contamination, the report should recommend if any further remedial actions or ongoing management actions are required to restore the site to acceptable conditions and meet regulatory and/or lease requirements. In the event that contamination is identified, that requires remediation, the appointment of a suitable Contaminated Sites Assessor as defined under the Airports (Environment Protection) Regulations 1997 will be required.

### **3.2 Lease Expiry Site Inspection**

In advance of the tenant vacating the premises, the PAPL Asset Manager will arrange a site inspection. In most cases, they will invite the applicable member of the AEH team to also attend, to assess site conditions. The AEH team member may complete a Vacating Tenant Environmental Inspection Checklist (Appendix 1).

### **3.3 Environmental Documentation**

Vacating tenants should ensure that any environmental records or documents have been provided to the PAPL AEH team. Records may include monitoring results, annual report, incident reports, close out evidence for any actions raised in audits, contamination management documentation, bore logs/construction details and any other relevant environmental management records.

## 4 Legislative Context

This guideline is prepared with consideration of the Airport (Environment Protection) Regulations 1997 (extracts below). However, the Tenant must make their own independent assessment of their legal obligations and must rely solely on their own investigations and analysis.

### *Regulation 6.05 Duties of sublessees and licensees*

- (1) *To ensure effective monitoring under subregulation 6.02 (1), an occupier of part of an airport site must give all reasonable assistance to the airport-lessee company for the airport, including:*
  - (a) *establishing and maintaining its own appropriate system, or systems, of monitoring the environmental consequences of:*
    - (i) *its activities; and*
    - (ii) *the activities of other persons in the area occupied; and*
  - (b) *reporting to the airport-lessee company the results of the monitoring.*
- (2) *An occupier must give the airport-lessee company, at any reasonable time, and after a request in writing, any access the airport-lessee company reasonably requires:*
  - (a) *to the area, or part of the area, occupied; or*
  - (b) *to a document, or part of a document, under the control of the occupier.*
- (3) *At the request of an airport-lessee company, if the Secretary is satisfied that an occupier is not complying with subregulation (1) or (2), the Secretary may direct the occupier, in writing, to so comply.*
- (4) *An occupier receiving a direction under subregulation (3) must:*
  - (a) *comply with the direction; and*
  - (b) *if a period is specified in the direction — comply before the end of the period.*

*Penalty: 50 units*
- (5) *In this regulation, **occupier** means a person having a right of occupation of part of the airport site under:*

### *Regulation 6.07 Duty to assess soil condition*

- (1) *The condition of soil in an area of an airport must be assessed by an airport environment officer for the airport if:*
  - (a) *the airport environment officer has reason to suspect that:*
    - (i) *the soil in the area is contaminated by a pollutant mentioned in column 2 of table 1 in Schedule 3 in a way that causes an effect described in subregulation 2.03 (1); or*
    - (ii) *contamination in the soil by a pollutant mentioned in column 2 of table 1 in Schedule 3 is possibly migrating to another place where it is causing an effect described in subregulation 2.03 (1); or*

- (b) *the soil, being in an area specified under subparagraph 71 (2) (h) (ii) or (3) (h) (ii) of the Act as an area of environmental significance, is possibly contaminated by a pollutant mentioned in column 2 of table 2 in Schedule 3 in a way that causes an effect described in subregulation 2.03 (1); or*
  - (c) *the soil is in an area of land that:*
    - (i) *is likely to have previously experienced some pollution; and*
    - (ii) *is subject to a sublease or licence that is about to expire or is proposed to be terminated or transferred; or*
  - (d) *the soil is in area of land that is affected by a proposed change of use, under a final master plan for the airport, of a kind described in subregulation (2).*
- (2) *A change of use to which paragraph (1) (d) applies is a change that necessitates greater environmental protection measures because the use will result in the land being used in a way, or for a purpose, that will, or is reasonably likely to, cause greater harm:*
- (a) *to an aspect of the environment; or*
  - (b) *to the health, safety or, in any respect, the welfare of, human beings.*
- (3) *For paragraph (1) (c), the sublessee or licensee must give an airport environment officer for the airport, at least 2 months before the expected occurrence of the event mentioned in subparagraph (1) (c) (ii), a written report of an expert investigation of the condition of soil in the area of the sublease or licence*

## Disclaimer

The Tenant acknowledges that this document is general information only and does not constitute specific advice regarding the Tenant's legal obligations, including under any contract between PAPL and the Tenant or arising under the *Airports Act 1996* (Cth) and the Airports (Environment Protection) Regulations 1997 (Cth). The Tenant must make their own independent assessment of its legal obligations and rely solely on its own investigations and analysis.

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## 5 Definitions and Acronyms

BEA	Baseline Environmental Assessment
BTEXN	Benzene, toluene, ethylbenzene, xylenes, and naphthalene
CSM	Conceptual Site Model
DWER	Department of Water and Environment and Regulation
DSI	Detailed Site Investigation
ESR	Environmentally Sensitive Receptor
LEEA	Lease Expiry Environmental Assessment
NATA	National Association of Testing Authorities
NEMP	PFAS National Environmental Management Plan
NEPM	National Environment Protection Measure
OCP/OPP	Organochlorine pesticides/organophosphorus pesticides
PAPL	Perth Airport Pty Ltd
PAH	Polycyclic aromatic hydrocarbons
PFAS	Per and Polyfluoroalkyl Substances
TRH	Total recoverable hydrocarbons

## 6 Related Documents

PAPL-ENV-MAN-002

Environment Requirements Manual

## Appendix 1 - Vacating Tenant Environmental Inspection Checklist

<b>Tenant</b>		<b>Date</b>	
<b>Address</b>			

Item No.	Criteria	Findings C, N/C, N/D, N/A	Explanation of Result
<b>1.0</b>	<b>General</b>		
1.1	Note lease type		
1.2	Has the premises been used per lease/agreement		
1.3	Have actions from recent audits and inspections been closed?		
1.4	Have all required records, documents been submitted to PAPL? Records may include results of monitoring, annual reports, incident reports, contamination management or other environmental management records.		
1.5	Have all facilities and items that are to remain been agreed with the PAPL property team?		
1.6	Where facilities are to remain, are 'As Constructed' drawings supplied to PAPL?		
<b>2.0</b>	<b>Hydrocarbons and chemicals and contamination</b>		
2.1	Are hydrocarbon and chemical storage and use areas identified?		
2.2	What volumes of hydrocarbons and other chemicals were used or stored on site?		
2.3	Have all hydrocarbons and chemicals been removed from site?		
2.4	Are there known incidents, releases or contamination events at the site?		
2.5	Have incidents or contamination been removed, cleaned up or otherwise appropriately treated?		
2.6	Are areas of known or suspected contamination present on the site?		
2.7	Has environmental investigation, evaluation and development of an approved ongoing management strategy been completed for contaminated sites?		
2.8	Is further work in accordance with 'Perth Airport Lease Expiry Environmental Works Requirements' needed?		

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