URS

Report

Independent Third Party Audit

AUSTRALIA

Environment Protection and Biodiversity Conservation Approval Audit

10 July 2015
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ABBREVIATIONS

Abbreviation	Description
BAAM	Biodiversity Assessment and Management Pty Ltd
EIS	Environmental Impact Statement
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999*
GPF	Gas Processing Facility
LNG	Liquefied Natural Gas
MDL	Minimum Disturbance Lease
MNES	Matters of National Environmental Significance
RABQSA	Registrar Accreditation Board Quality Society of Australasia
ROW	Right of Way
TEC	Threatened Ecological Community
TECMP	Threatened Ecological Community Management Plan
TFLMP	Threatened Flora Management Plan
TFMP	Threatened Fauna Management Plan

EXECUTIVE SUMMARY

URS Australia Pty Ltd (URS) was commissioned by Origin to undertake an audit of conditions 3 to 13 and 20 to 26 of the Australia Pacific LNG approval under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) for the development of the Walloons gas fields (EPBC 2009/4974). The Department of the Environment requested the audit in accordance with condition 102 of the EPBC approval, to be performed in compliance with conditions 103 to 107.

In accordance with condition 103, the Department of the Environment (the Department) approved URS as an independent auditor, with the audit criteria approved on 11 December 2014.

The audit sought to review documentation and site implementation where current activities are most relevant to Matters of National Environmental Significance (MNES) in order to meet the audit objective. The Combabula Development Area was targeted as a representative sample of activities across the Walloons gas fields.

The audit report was submitted to the Department on 12 March 2015. On 15 May 2015, the Department provided comments on the audit report, requesting further information or clarification. This audit report provides updated comments and compliance assessments where additional evidence has been provided by Origin, and seeks to clarify audit findings. URS has undertaken these updates as an independent auditor, relying only on the available evidence. For audit transparency, documentation associated with the update (original audit report dated 19 February 2015, Department comments, and an updated compliance evaluation table) have been appended to this report.

1 INTRODUCTION

1.1 Background

The Australia Pacific LNG Project received Commonwealth environmental approval for the development, construction, operation and decommissioning of the Walloons gas fields within the Surat Basin in south-central Queensland on 21 February 2011 (EPBC 2009/4974). The location of the Walloons gas fields is shown in Figure 1-1.

On 5 February 2014, the Department of the Environment (the Department) directed Origin Energy (Origin), on behalf of Australia Pacific LNG, to undertake an audit of specific conditions of the approval[1]. The Department stated the following objective for this audit:

An audit will verify the effectiveness of these conditions in protecting matters of National Environmental Significance, and whether the action is being undertaken in accordance with the approval conditions.

URS Australia Pty Ltd (URS) was commissioned by Origin to undertake this audit, and was subsequently approved by the Department as an independent auditor in accordance with condition 103 of the approval[2]. The URS audit team qualifications and experience are provided in Section 3.1. The audit criteria was approved by the Department on 11 December 2014, in accordance with condition 103 of the approval[3].

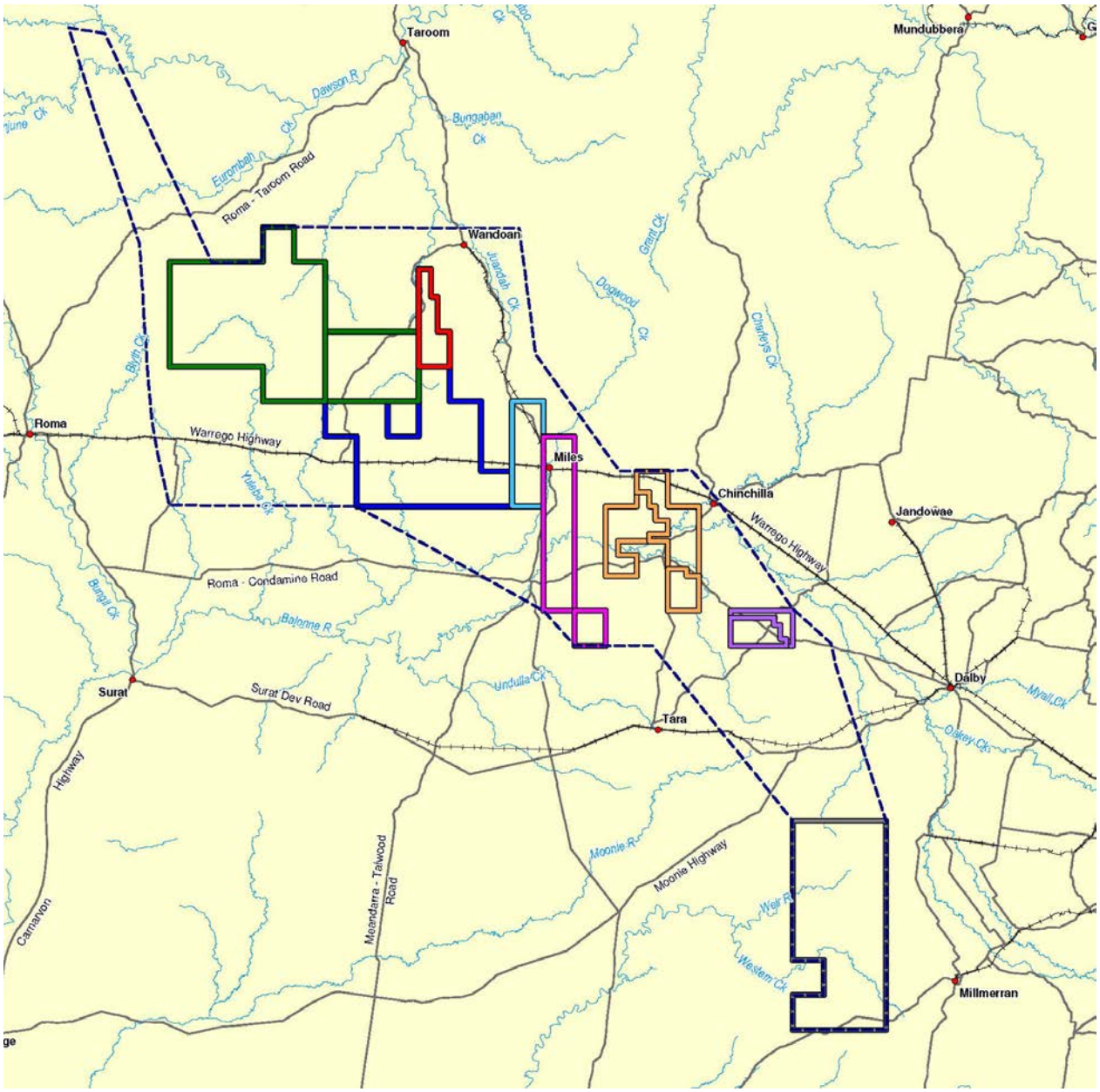
The audit report was submitted to the Department on 12 March 2015. On 15 May 2015, the Department provided comments on the audit report, requesting further information or clarification. This audit report provides updated comments and compliance assessments where additional evidence has been provided by Origin, and seeks to clarify audit findings. URS has undertaken these updates as an independent auditor, relying only on the available evidence. For audit transparency, documentation associated with the update (original audit report[4], Department comments, and an updated compliance evaluation table) have been appended to this report.

1.2 Audit Scope

The Department requested that the audit scope include conditions 3 to 13 and 20 to 26 of EPBC 2009/4974. These conditions primarily address environmental constraints planning documentation and implementation, and species management plans for fauna, flora and threatened ecological communities listed under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

[1] Letter from Shane Gaddes (Assistant Secretary, Compliance and Enforcement Branch, Department of the Environment) to Rob Ully (Environmental Approvals and Strategy Manager, Origin Energy), dated 5 February 2014. Department of the Environment reference: 2013/12231.
[2] Letter from Shane Gaddes to Rob Ully, dated 12 May 2014. Department of the Environment reference: 2014/02846
[3] Letter from Shane Gaddes to Rob Ully dated 11 December 2014, Department of the Environment reference 14/008248
[4] URS (2015). Independent Third Party Audit Environment Protection and Biodiversity Conservation Approval Audit, 19 February 2015, Revision 0

Figure 1-1 Australia Pacific LNG Walloons gas field development areas



2 CONTEXT

2.1 Project overview

Australia Pacific LNG Pty Limited is an incorporated joint venture between Origin Energy Limited (37.5%), ConocoPhillips (37.5%) and Sinopec (25%). The Australia Pacific LNG project includes the development of Australia Pacific LNG's substantial coal seam gas resources in the Surat and Bowen Basins, a 530 km transmission pipeline, and a multi-train liquid natural gas (LNG) facility on Curtis Island, near Gladstone.

Gas Processing Facilities (GPF) construction is now 88% complete with 9 compression trains across 5 gas plants, of which 4 trains are reliably producing into the domestic market on an ongoing basis, all remain on schedule for delivery. The Condabri Central Plant has been the first of the 7 new plants to be commissioned.

First gas to the LNG facility has been achieved and marks the commissioning of the 530 km high pressure gas pipeline, being an important milestone for the project.

Over the life of the phase 1 project, the Drilling and Completions (D&C) team will drill 977 coal seam gas (CSG) development wells.

The Gathering and Development (G&D) team is responsible for the design and construction of low pressure gas and water gathering systems to connect the wells with the gas and water processing facilities; the connection of wellhead separation facilities at the wells and associated infrastructure such as roads, bridges and communications to provide access to the wells and processing facilities.

2.2 Walloons Gas Field Development

The Australia Pacific LNG project includes the Walloon gas fields in the Surat Basin. The Walloons gas fields comprise eight development areas, namely (Figure 1-1):

- Combabula/Ramyard
- Condabri
- Talinga/Orana
- Woleebee
- Kainama
- Gilbert Gully
- Dalwogan
- Carinya

The development in these gas fields is at varying stages, from clearing and construction to rehabilitation and operational facilities. Due to the geographic size and extent of activities across the gas fields, URS sought to review documentation and on-site implementation where current activities are most relevant to MNES. The audit methodology for determining a representative sample is documented in Section 3.

Initially, following discussions with Origin, the Condabri and Combabula development areas were selected for targeted auditing. However, at the time approval of the audit criteria was received, only the Combabula development area was considered as a representative sample of MNES interaction at the time of the site visit. The implementation of the Environmental Constraints Planning and Field Development Protocol and species management plans is undertaken at all Walloons gas fields through the same process and documentation hierarchy,

described in Sections 2.3 and 2.4. As such, limiting the site audit scope is not considered to impact the representativeness or effectiveness of the audit.

2.3 Environmental Constraints Planning and Field Development Protocol

In accordance with Condition 5 of the approval, Australia Pacific LNG has developed an Environmental Constraints Planning and Field Development Protocol (the Protocol).

The Protocol describes the process for obtaining internal environmental approval for disturbance activities for the upstream Australia Pacific LNG Project consisting of well head drilling and commissioning, gas field facilities sites, the gathering network and high pressure pipeline, where it lies within the gas fields only. The purpose of the Protocol is to ensure compliance with all relevant Commonwealth environmental approval requirements, EIS commitments and obligations prior to clearing.

The Protocol sets out the method of environmental constraints assessment and environmental construction planning including, namely:

- Desktop assessment;
- Pre-clearance field ecological assessment;
- Pre-construction field environmental scout;
- Targeted ecological survey;
- Application of environmental constraints to infrastructure planning;
- Data collection and storage; and
- Documentation and reporting requirements.

Condition 20 of the approval requires implementation of the Protocol.

2.3.1 Implementation Process

The design and location of gas field infrastructure is controlled through the constraints process, which includes a series of hold points which address a range of requirements, including environmental approvals. This applies across all of the Walloons gas fields and all aspects of the project, including well head drilling and commissioning, gas field facilities sites, the gathering network and high pressure pipeline.

The following describes the implementation of the process with respect to environmental requirements only:

1. The preliminary design/alignment of infrastructure involves a desktop assessment taking into account the requirements of the Protocol (Section 7.1 of the Protocol). These requirements include, but are not limited to, environmentally sensitive areas, Biodiversity Assessment and Management Pty Ltd (BAAM) sensitivity mapping, bioregional corridors, watercourses, and soils.

2. The preliminary design is then field scouted to identify potential environmental constraints not previously identified in the desktop assessment. This includes ground-truthing mapped environmental constraints for accuracy. The requirements of a pre-clearance field ecological assessment are addressed in Section 7.2 of the Protocol.

3. The design is refined based on ground-truthed environmental constraints (i.e. avoidance of MNES), with planning decisions documented in an Environmental Constraints Assessment.

4. Where impacts to MNES are unavoidable in the final design, the justification for disturbance has previously been recorded in Squad Checks. As the project moves into the operations phase, these justifications are documented in Threatened Ecological Community (TEC) drawdown records.

5. Key environmental values and management requirements of the final infrastructure design are provided to the Principal Contractor as an Environmental Workpack. The workpack is accompanied by a hold point list which requires sign off by field personnel at various stages of development to ensure activities do not proceed without the necessary approvals. These hold points include external approvals, pre-construction, site establishment, construction and workpack completion.

6. The final design is pegged out by surveyors. Disturbance is recorded as the area provided to the Principal Contractor to be cleared. Where the actual area cleared is smaller than the design, this is reported to Australia Pacific LNG by the Principal Contractor for accurate disturbance recording.

The Protocol documents the environmental requirements to be addressed in the final design. Following pegging of the design at the site, interaction and management of MNES is undertaken through the implementation of species management plans.

2.4 Species Management Plans

In accordance with Condition 7 of the approval, Australia Pacific LNG has developed three species management plans:

- Threatened Fauna Management Plan (TFMP);
- Threatened Flora Management Plan (TFLMP); and
- Threatened Ecological Community Management Plan (TECMP).

The TFMP, TFLMP and TECMP address the development approval conditions for threatened and migratory fauna species, threated terrestrial flora species, and TECs listed under the EPBC Act. These management plans relate to species that are known to occur and that may potentially occur within the approved Australia Pacific LNG gas field. Each management plan also provides technical information and appropriate measures to help avoid and mitigate potential impacts.

Condition 9 of the Approval requires implementation of the Species Management Plans.

2.4.1 Implementation Process

The species management plans detail impact minimisation and management practices for threatened fauna, flora and ecological communities. The plans address the development, construction, operation and decommissioning phases of the project, as well as monitoring requirements.

3 METHODOLOGY

The audit was conducted in accordance with EPBC 2009/4974 approval conditions 102 to 107, using audit criteria approved by the Department. The audit was carried out in accordance with AS/NZS ISO 19011:2003 Guidelines for quality and/or environmental management systems auditing and the audit principles contained within the Department guidelines.

3.1 Audit Team

URS established a highly experienced and qualified independent audit team to undertake the work. The auditors were led by Rob Storrs, a qualified QSA Environmental Auditor (certificate provided in Appendix C). The team structure is shown in Figure 3-1 and details of each audit team member are summarised in Table 3-1 (CVs are provided in Appendix C). The URS audit team have been recognised by the Department to meet the criteria of an independent auditor in accordance with condition 103 of the approval[5].

Figure 3-1 Audit Team Structure

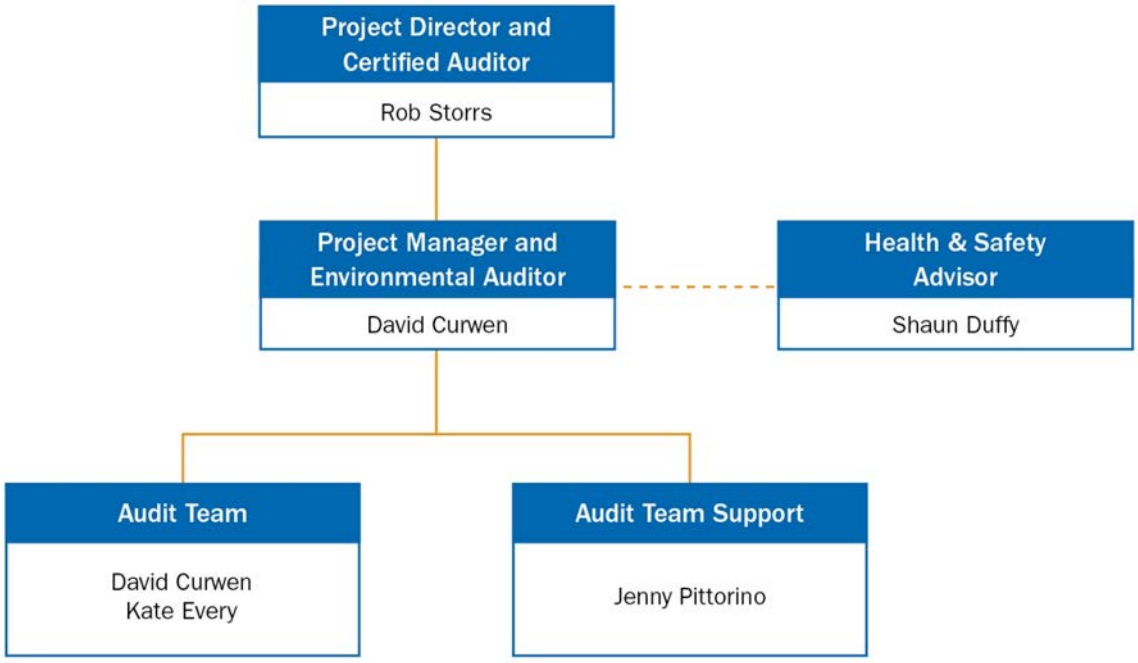


Table 3-1 Audit Team Qualifications

Personnel	Qualifications	Role	Experience (years)
Rob Storrs	BEnvSc (Hons)	Project Director Lead Auditor	20
David Curwen	BSc (Hons), MSc	Project Manager Environmental Auditor	19
Kate Every	BSc (Marine Science), MEnvMan	Environmental Auditor	4
Shaun Duffy	AdvDipOHS	Health and Safety Manager	20

[5] Letter from Shane Gaddes to Rob Ully, dated 12 May 2014. Department of the Environment reference: 2014/02846

3.2 Audit Criteria

The audit criteria was approved by the Department on 11 December 2014, in accordance with condition 103 of the approval[6]. The criteria form a compliance evaluation table including:

- Criterion (the approval condition);
- Independent auditor comments (audit findings);
- Measurements made (evidence reviewed);
- Requirement (how compliance is to be assessed);
- Verification method; and
- Compliance finding.

The compliance finding ratings, in accordance with the Department's Audit Criteria and Methodology, are as follows:

- Compliance - A rating of 'compliance' is given when the auditee has complied with a condition or element of a condition;
- Non-compliance - A rating of 'non-compliance' is given when the auditee has not met a condition or element of a condition;
- Not applicable - A rating of 'not applicable at the time of the audit' is given when the condition or element of a condition falls outside the scope of the audit e.g. if an activity has not yet commenced;
- Undetermined - A rating of 'undetermined' is given when the condition or element of a condition falls inside the scope of the audit but there is insufficient evidence to make a judgment on compliance or non-compliance; and
- Observation - An 'observation' may be made about issues relevant to the protection of a matter of national environmental significance when the issue is not strictly related to compliance or non-compliance with a condition or element of a condition.

The compliance evaluation table is provided in Appendix A.

3.3 Approach

The audit sought to review documentation and site implementation where current activities are most relevant to MNES. As described in Section 2.3, the requirements of the Protocol are applicable across all of the Walloons gas fields and all aspects of the project, including well head drilling and commissioning, gas field facilities sites, the gathering network and high pressure pipeline. Implementation is understood to be consistent at each gas field as each Principal Contractor across the project receives environmental information in the same format (the environmental workpack). As such, the Combabula Development Area was targeted as a representative sample of activities across the gas fields. It is considered that a focus on Combabula is sufficient to meet the audit objective of verifying the effectiveness of approval conditions in protecting MNES, and whether the action is being undertaken in accordance with the approval conditions.

[6] Letter from Shane Gaddes to Rob Ully dated 11 December 2014, Department of the Environment reference 14/008248

3.3.1 Desktop Assessment

URS requested copies of all documentation that the approval conditions required to be prepared, including the Protocol and Species Management Plans. The nature and extent of these documents were reviewed and their compliance against the requirements of the approval conditions assessed and recorded in the compliance evaluation table.

3.3.2 Site Audit

A site visit to the Combabula development area was undertaken on 2 and 3 February 2015 to assess conditions that required visual inspection. Within the Combabula gas field, a review of the various operations currently being undertaken by the Gathering, Facilities, and Drilling and Completions teams was carried out. The purpose of this review was to identify those locations where the audit team could see evidence of the management of MNES and implementation of the various management plans. The locations identified for the site visit were:

- Combabula gas processing facility (GPF);
- Golden & Wathen Zones 2A; and
- RG Golden property.

During the site visit, information required to assess compliance was collected through both observations and discussions with Origin, Leighton (Principal Contractor, Gathering Network), and Laing O'Rourke (Principal Contactor, GPF) personnel.

Following the initial documentation review and site visit, a list of outstanding evidence was compiled and provided to Origin.

3.4 Assumptions

The audit evidence is based on samples of the available information, which is considered to be representative of the operations across the Walloons gas fields and best capture the potential for impacts to MNES at the time of the audit. This approach and the level of uncertainty is consistent with the guidance provided in ISO 19011.

All documentary evidence provided by individuals during this audit was assumed to be current and accurate at the time of the audit. It was understood that URS would be notified of any updates to this documentation made during the audit, to be included as a post-audit note within the report.

Verbal communications were taken at face value unless evidence highlighted conflict or inconsistencies and warranted further investigation. Verbal communications were of particular importance when auditing conditions or events that had not yet occurred, and where no complaints had been received (i.e. in cases where there was no evidence to prove a non-event).

3.5 Response to Department Comments

On 15 May 2015, the Department provided comments on the audit report requesting further information or clarification against several conditions. This audit report provides updated comments and compliance assessments where additional evidence has been provided by

Origin, and seeks to clarify audit findings. URS has undertaken these updates as an independent auditor, relying only on the available evidence. For audit transparency, documentation associated with the update (original audit report, Department comments, and an updated compliance evaluation table) have been appended to this report.

4 AUDIT RESULTS

4.1 Audit Findings Overview

The audit scope included conditions 3 to 13 and 20 to 26 of the approval. The compliance evaluation considers each of these conditions and their sub-conditions as a separate criterion. Conditions 5 and 8 have also been assessed for compliance on separate implementation checklists using the templates provided by the Department. The checklists, updated following Department comments on the audit report, are provided in Appendix A. The previous compliance evaluation table is provided with the original submission in Appendix C.

Overall, the project was assessed as highly compliant, with conditions in non-compliance summarised in Table 4-1 and Table 4-2. These non-compliances are discussed further in Section 4.2. There were five conditions (or subconditions) for which a compliance rating was not able to be determined, due to the unavailability of a sufficiently representative sample of documentation to measure compliance.

Table 4-1 Summary of Conditions in Non-compliance (Documentation Checklist)

Condition number	Condition Requirement
5o)v)	The Protocol must ensure site assessments and field ecological surveys document the survey methodology, results and significant findings in relation to MNES.
8j)	The management plans required under condition 7 must…as a minimum address the following as relevant to each MNES: surface and ground water quality and quantity requirements, including relevant downstream environmental quality parameters.
13a)	If an impact occurs (which may include a presumed impact where the species is presumed to be present) to a MNES during gas field development, operation, or decommissioning the proponent must: a) record the impact by reference to: i) the location, specific site and type of infrastructure or activity; ii) each MNES subject to disturbance; iii) the related site assessment or field ecological survey documentation and recommendations, or the decision that the particular MNES was presumed to be present; iv) the disturbance limit set under condition 25; v) the total area of actual disturbance; vi) the remaining disturbance limit for each affected MNES; vii) the reasons for the decision including justification for the action taken, description of the efforts taken to avoid impact, and explanation why other constraints might justify the impact on MNES; viii) actions and commitments by the proponent to remediate, rehabilitate, or make good any unauthorised disturbance.

Table 4-2 Summary of Conditions in Non-compliances (Implementation Checklist)

Condition number	Condition Requirement
5i)	The Protocol must calculate disturbance as required in condition 13
5o)ii)	The Protocol must ensure site assessments and field ecological surveys take into account and reference previous ecological surveys undertaken in the area and relevant new information on likely presence or absence of MNES;

4.2 Discussion of non-compliances

The Protocol was approved by the Department on 1 September 2011[7] as meeting conditions 5, 6, 13 and 21 of the approval. The same approval letter acknowledged the TFMP, TFLMP, TECMP as meeting conditions 5 (h and p), 7, 8, 9 and 10.

At the Department's request, the Protocol and plans were reviewed against the conditions to assess whether all requirements have been included. The Protocol was assessed as containing all required inclusions, with the exception of sub-condition 5.o)v) (documenting survey methodology in pre-clearance ecological surveys). It was noted that survey methodology was documented in the pre-clearance surveys sighted during the audit, despite the requirement not being specifically outlined in the Protocol. The Species Management Plans were assessed as containing all required inclusions, with the exception of sub-condition 8j) (include surface and ground water quality and quantity requirements).

In accordance with condition 5o)ii), the Protocol requires that site assessments and field ecological surveys take into account and reference previous ecological surveys undertaken in the area and relevant new information on likely presence or absence of MNES. However, while several documents did contain references, this has not been undertaken in all of the ecology assessment reports or pre-clearance surveys provided during the audit. As such, the condition was assessed as non-compliant.

Some sub-conditions of condition 13 of the approval require disturbance to MNES to be recorded. Records were provided for disturbance to TECs during the audit, however the auditors were advised that disturbance to potential habitat for threatened fauna is not currently documented. As potential habitat is not recorded, the relevant sub-conditions of condition 13 were evaluated as not compliant. However, as a non-compliance is given when the auditee has not met a condition or element of a condition, and there is insufficient evidence to make a judgement that potential habitat disturbance levels have been exceeded, condition 25 has been evaluated as undetermined. It is understood that classification of potential habitat is the subject of ongoing discussion between Origin and the Department.

[7] Letter from James Barker (A/g Assistant Secretary, Environment Assessment Branch 2) to Katherine Jack (Senior Environmental Advisor, Origin Energy), dated 1 September 2011. Department of the Environment references 2011/05747, 2011/05126, and 2011/05748

4.3 Site visit observations

Impact Minimisation

It was observed during the site visit that, where possible, Principal Contractors are minimising the extent of their clearance below the authorised disturbance. Specific examples are provided below:

- The GPF workpack (Q-4200-15-WP-1005) specifies a maximum disturbance area to TECs of 3.667ha at the southern end of the GPF, however Laing O'Rourke have minimised this total disturbance to 1.6274 ha.
- Well leases are classified as either a civil lease (cut and fill, full clearance, removal of topsoil) or a minimum disturbance lease (MDL) (vegetation slashed, no disturbance of soil). Examples of each lease type were observed during the site visit, with site personnel advising that MDLs are the preferred option where the safety of crew and equipment is not compromised.
- Leighton (Principal Contractor on the Combabula gathering network) advised that, where safe and possible, clearing is not conducted to the full width of the right of way (ROW).

TEC management

In order to view current examples of MNES interaction, the auditors specifically visited sites where TEC's are either being cleared or are adjacent to activities.

Signage identifying TECs was observed at locations within the GPF, drilling (CMN280) and gathering (CMN111-2) footprints (Figure 4-1, Figure 4-2, and Figure 4-3). This signage is in line with the management requirements detailed in the respective environmental workpacks. The auditors were informed that signage is spaced at the environmental advisors' discretion. It was noted that field staff had erred on the side of caution in placing signage to keep ecological issues high profile, even in areas where TECs were nearby but outside disturbance areas.

Fencing of TECs was observed at the GPF site using blue rope rather than bunting; this was at the landowner's request. Well leases are staked and fenced prior to clearing to prevent unauthorised interaction with TECs, however the gathering network was not fenced due to its length and the progressive movement along the ROW.

Figure 4-1 GPF TEC signage

Figure 4-2 Well lease signage (off lease TEC)

Figure 4-3 Gathering network TEC signage

Note: TEC designation relates to dense stand of trees visible in the background.

Reinstatement

At the completion of construction activities, areas are required to be reinstated. Reinstatement involves the respreading and seeding of topsoil. This was observed along the GPF access road, gathering network and on completed well leases, with recent rain promoting vegetation growth. In particular, long stretches of successful reinstatement was observed along the gathering ROW (Figure 4-4).

Figure 4-4 Reinstatement along gathering network ROW

On-site knowledge of environmental requirements

During the site audit, it was apparent that site personnel from Origin, Leighton, Laing O'Rourke and Queensland Fauna Consultancy were confident in their understanding of environmental requirements. This knowledge primarily included the specifics of the environmental workpacks, as well as fauna and flora management and erosion and sediment control relevant to the site.

5 RECOMMENDATIONS AND CONCLUSIONS

5.1 Conclusions

The audit identified and focused on a representative sample of documentation and site implementation across the Walloons gas fields to assess compliance against specific conditions of the Project's approval (EPBC 2009/4974). This audit report revision sought to clarify compliance evaluations and the evidence reviewed, while providing further information based on additional evidence provided. URS has undertaken these updates as an independent auditor, relying only on the available evidence.

A number of conclusions have been identified as a result of this audit:

- Overall, the project was assessed as highly compliant. With the exception of the minor non-compliances identified in Section 4, the action is being undertaken in accordance with the approval conditions;
- No evidence of impact to MNES, other than approved disturbance, was identified during the audit;
- Evidence of minimisation of disturbance areas by Principal Contractors was noted;
- Environmental non-compliances with the scoped conditions were primarily associated with minor omissions in documentation or a result of ongoing discussions with the Department (e.g. potential habitat); and
- On-site personnel were confident and knowledgeable regarding environmental requirements for interaction with MNES.

5.2 Recommendations

Where non-compliance has been identified during this audit, the following recommendations are made to assist with future compliance:

- Ensure all condition requirements are included in future revisions of the Protocol and species management plans, or consider amending conditions;
- Continue discussions with the Department regarding the classification of potential habitat for threatened fauna, in order to adequately record disturbance; and
- Further improve the verification of disturbance records with the expanded use of aerial imagery, allowing comparison against the approved disturbance area provided to Principal Contractors.

6 LIMITATIONS

URS Australia Pty Ltd (URS) has prepared this report in accordance with the usual care and thoroughness of the consulting profession for the use of Origin Energy and only those third parties who have been authorised in writing by URS to rely on this Report.

It is based on generally accepted practices and standards at the time it was prepared. No other warranty, expressed or implied, is made as to the professional advice included in this Report.

It is prepared in accordance with the scope of work and for the purpose outlined in the contract dated 18 February 2013.

Where this Report indicates that information has been provided to URS by third parties, URS has made no independent verification of this information except as expressly stated in the Report. URS assumes no liability for any inaccuracies in or omissions to that information.

This Report was prepared between June and July 2015 and is based on the conditions encountered and information reviewed at the time of preparation. URS disclaims responsibility for any changes that may have occurred after this time.

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It is the responsibility of third parties to independently make inquiries or seek advice in relation to their particular requirements and proposed use of the site.

Any estimates of potential costs which have been provided are presented as estimates only as at the date of the Report. Any cost estimates that have been provided may therefore vary from actual costs at the time of expenditure.

APPENDIX A UPDATED COMPLIANCE EVALUATION TABLES

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
EPBC Approval	To develop, construct, operate and decommission the coal seam gas field component of the Australia Pacific LNG Project in the Walloons gas fields with the Surat Basin in south Central Queensland, (EPBC 2009/4974).							
Criterion 3	Before the commencement of gas field development, the proponent must develop a Constraints Planning and Field Development Protocol (the Protocol).	The Protocol was issued as final on 31 August 2011. No amendments to the Protocol had been made at the time of the audit. Early works commenced at the gas fields on 19 October 2011, as per the notification to DSEWPac on 5 December 2011.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011 Email from Vicki Low (Australia Pacific LNG) to Dieter Kluger, subject DSEWPaC Weekly APLNG Activity Update, dates 5 December 2011.	Check that a Constraints Planning and Field Development Protocol (the Protocol) has been developed prior to commencement of gas field development.	Evaluation of evidence, including date of Protocol issue and emails and letters regarding commencement of operations.	Compliant		
Criterion 4	The Protocol must apply for the life of the project.	Section 9 of the Protocol states that "the approved Protocol will be incorporated into management procedures, operational plans and documentation and kept current for the life of the project"	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check Protocol includes statement confirming it applies for life of project.	Evaluation of the protocol to ensure it includes reference to applying for the life of the project.	Compliant		
Criterion 4	The Protocol must include the principles of:							
Criterion 4a	a) avoiding direct and indirect adverse impacts on MNES;	Section 3 of the Protocol lists principle (a).	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Protocol to include principles listed in condition.	Protocol sighted and reviewed by auditors to determine if it includes principle (a).	Compliant		
Criterion 4b	b) mitigating and managing direct and indirect impacts to minimise cumulative adverse impacts on matters of national environmental significance (MNES);	Section 3 of the Protocol lists principle (b).	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Protocol to include principles listed in condition.	Protocol sighted and reviewed by auditors to determine if it includes measure (b).	Compliant		
Criterion 4c	c) active site remediation and rehabilitation of impacted areas to promote and maintain long-term recovery of MNES.	Section 3 of the Protocol lists principle (c).	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Protocol to include principles listed in condition.	Protocol sighted and reviewed by auditors to determine if it includes measure (c).	Compliant		
Criterion 5	Protocol imposed constraints and assessment requirements -							
Criterion 5	5. The Protocol must:							
Criterion 5a	a. classify the following as being within the proponent's sensitivity categories 1 to 4 (or should the proponent's classification be revised, equivalent high environmental constraints class):							
Criterion 5a.i)	i. all listed threatened ecological communities;	This is addressed in Section 5.1.1.2 of the Protocol.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes a) i).	Evaluation of the protocol to ensure it includes a) i).	Compliant		
Criterion 5a.ii)	ii. all listed flora species; and	This is addressed in Section 5.1.1.2 of the Protocol.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes a) ii).	Evaluation of the protocol to ensure it includes a) ii).	Compliant		
Criterion 5a.iii)	iii. those listed threatened and migratory fauna species habitats as identified in management plans required under these conditions, which where relevant may be described in terms of specific niche habitat types;	This is addressed in Section 5.1.1.2 of the Protocol.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes a) iii).	Evaluation of the protocol to ensure it includes a) iii).	Compliant		
Criterion 5b	b. include constraints mapping for sensitivity category 1-7 as described in the proponent's Environmental Impact Statement;	Figures are not included in the Protocol. However, a cross reference is provided in the text to the APLNG EIS where BAAM sensitivity mapping for the project is provided (Volume 2, Chapter 8, Figure 8.7).	Australia Pacific LNG EIS, http://www.aplng.com.au/environment/our-environmental-impact-statement	Check the protocol includes b)	Evaluation of the protocol to ensure it includes b).	Compliant		
Criterion 5c	c. require pre-clearance site assessments of sensitivity category 1-4 by an approved suitably qualified ecologist;	Section 7.2 of the Protocol states that prior to conducting petroleum activities that involve significance disturbance to land, an assessment will be undertaken of the condition, type and ecological value of vegetation in the area. Section 7.2 also states that the pre-clearance assessment must be conducted by qualified persons approved by DSEWPaC if the areas proposed to be disturbed are identified to contain Ecological Sensitivity Mapping Categories 1-4.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes c)	Evaluation of the protocol to ensure it has included the requirements of c).	Compliant		
Criterion 5d	d. require pre-clearance site assessments of sensitivity category 5-7 by a suitably qualified environment officer;	Section 7.2 of the Protocol states that prior to conducting petroleum activities that involve significance disturbance to land, an assessment will be undertaken of the condition, type and ecological value of vegetation in the area. The assessment of Categories 5-7 will be conducted by a suitably qualified environmental officer.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes d)	Evaluation of the protocol to ensure it has included the requirements of d).	Compliant		
Criterion 5e	e. for any MNES identified following an assessment under 5d, require review of those pre-clearance site assessments by a suitably qualified ecologist;	Section 7.2.2 of the Protocol states that if in the course of pre-clearance field ecological assessment of areas of ecological sensitivity category 5-7 MNES is identified, these reports will be reviewed by an approved ecologist.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes e)	Evaluation of the protocol to ensure it has included the requirements of e).	Compliant		
Criterion 5f	f. update constraints mapping with results of any pre clearance site assessments which confirm presence of MNES;	Section 7.2.2 of the Protocol states that Site level field ecology assessment data captured in accordance with this Protocol will be used to create and continually update a data layer displayed in the Origin GIS. This “ground truthed” ecology data will represent the most up to date and accurate ecology information describing the project area.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes f)	Evaluation of the protocol to ensure it has included the requirements of f).	Compliant		
Criterion 5g	g. require the documentation of all planning decisions and pre-clearance site assessments and field ecological surveys in proposed gas fields development areas where sensitivity category 1-4 is mapped, likely, or found;	Section 7.1 of the Protocol states that the Environmental Advisor will conduct an initial evaluation of proposed infrastructure layouts and locations via a desktop assessment, which will include documentation of environmental constraints assessments and infrastructure planning decisions including initial completion of the environmental constraints checklist, which will be updated with ecological and field assessment data.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes g)	Evaluation of the protocol to ensure it has included the requirements of g).	Compliant		

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 5h	h. implement species management plans (as required in condition 7);	Section 7.1 of the Protocol states that the desktop assessment should, as a minimum consider the requirements of Threatened Species Plans and Threatened Ecological Community Plans	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes h)	Evaluation of the protocol to ensure if has included the requirements of h).	Compliant		
Criterion 5i	i. calculate disturbance as required in condition 13;	Section 7.7.1 states that total planned disturbance will be calculated using the Origin GIS by overlaying the approved infrastructure layouts over the field ecological assessment mapping, vegetation and land use datasets. Planned disturbance will be calculated on the basis of approved infrastructure designs and issued for construction work packs.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	The protocol must require calculation of disturbance areas (see condition 13)	Review the protocol to determine if it requires calculation of disturbance areas as required in condition 13.	Compliant		
Criterion 5j	j. take into account all current survey data and available information and maps of all MNES relevant to the project area as described within environmental sensitivity category 1-4; and	Section 7.1 of the Protocol states that the desktop assessment should, as a minimum, consider potential impacts on MNES including data from EPBC Protected Matters search results, previous ecological surveys undertaken in the area and relevant new information on likely presence or absence of MNES.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes j)	Evaluation of the protocol to ensure it has included the requirements of j).	Compliant		
Criterion 5k	k. require the pre-clearance site assessments and field ecological surveys to identify and assess options relating to development impacts on MNES and provide recommendations to inform the development of the project area;	Section 7.2 of the Protocol states that the scope of the pre-clearance field ecological assessment shall include site specific management recommendations to minimise impact on MNES, significant flora and fauna including identification of previously cleared or disturbed areas or lower value vegetation.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes k)	Evaluation of the protocol to ensure if has covered the requirements of k).	Compliant		
Note	Note: The proponent's approach to sensitivity mapping relates to impact avoidance and mitigation as described in volume 2, chapter 23 of the proponent's Environmental Impact Statement (publicly released 20 March 2010). The indicative sensitivity categories described in the EIS are:					Not applicable		
	Category 1: Extremely sensitive: Siting of infrastructure within these areas will be avoided.	Section 7.6.1 of the Protocol states that terrestrial ecology sensitivity category as identified and mapped in the EIS, and as updated, will be applied to siting of all infrastructure types in accordance with the requirements set out in Table 4. Table 4 reflects this condition's description of the sensitivity category management.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011		Review the protocol to determine of Category 1 requirements are addressed.	Compliant		
	Category 2: Highly Sensitive: Infrastructure will only be located within or in proximity to existing cleared and disturbed areas to reduce fragmentation; Limited clearing (if necessary for incremental expansion of existing disturbance) for construction to be rehabilitated prior to operation.	Section 7.6.1 of the Protocol states that terrestrial ecology sensitivity category as identified and mapped in the EIS, and as updated, will be applied to siting of all infrastructure types in accordance with the requirements set out in Table 4. Table 4 reflects this condition's description of the sensitivity category management.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011		Review the protocol to determine of Category 2 requirements are addressed.	Compliant		
	Category 3: Sensitive: Clearing only for linear infrastructure and well leases. Non-linear infrastructure to be located within or in proximity to existing cleared and disturbed areas. Disturbed areas not required for ongoing operation to be rehabilitated prior to operation.	Section 7.6.1 of the Protocol states that terrestrial ecology sensitivity category as identified and mapped in the EIS, and as updated, will be applied to siting of all infrastructure types in accordance with the requirements set out in Table 4. Table 4 reflects this condition's description of the sensitivity category management.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011		Review the protocol to determine of Category 3 requirements are addressed.	Compliant		
	Category 4: Neutral: Clearing for linear and non-linear infrastructure is to minimise edge effects where possible.	Section 7.6.1 of the Protocol states that terrestrial ecology sensitivity category as identified and mapped in the EIS, and as updated, will be applied to siting of all infrastructure types in accordance with the requirements set out in Table 4. Table 4 reflects this condition's description of the sensitivity category management.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011		Review the protocol to determine of Category 4 requirements are addressed.	Compliant		
	Category 5: Robust: Clearing for infrastructure, although hollow-bearing trees and habitat connectivity, particularly along watercourses, to be retained.	Section 7.6.1 of the Protocol states that terrestrial ecology sensitivity category as identified and mapped in the EIS, and as updated, will be applied to siting of all infrastructure types in accordance with the requirements set out in Table 4. Table 4 reflects this condition's description of the sensitivity category management.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011		Review the protocol to determine of Category 5 requirements are addressed.	Compliant		
	Category 6 and 7: Cleared: Siting of infrastructure >100m from edges of categories 2-5 and >200m from category 1.	Section 7.6.1 of the Protocol states that terrestrial ecology sensitivity category as identified and mapped in the EIS, and as updated, will be applied to siting of all infrastructure types in accordance with the requirements set out in Table 4. Table 4 reflects this condition's description of the sensitivity category management.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011		Review the protocol to determine of Category 6 & 7 requirements are addressed.	Compliant		
Criterion 5l	l. to avoid direct and indirect adverse impacts on MNES, including fragmentation and edge effects, provide that proposed infrastructure is located in accordance with the following:							
Criterion 5l	When siting exploration and production wells:							

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 5l.i)	i. avoid development within sensitivity category 1 unless authorised in writing by the Department;	Section 7.6.4 of the Protocol states that when making decisions regarding the siting of infrastructure the following requirements must be satisfied - avoid development within areas mapped as ecological sensitivity category.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) i)	Evaluation of the protocol to ensure it has included the requirements of 5l) i).	Compliant		
Criterion 5l.ii)	ii. avoid development within sensitivity category 2-4, unless the location within any of these sensitivity categories is justified given other constraints, and the impact on any MNES will be minimal, short term and recoverable;	Section 7.6.4 of the Protocol states that when making decisions regarding the siting of infrastructure the following requirements must be satisfied - avoid development within ecological sensitivity category 2-4 unless the location within any of these sensitivity categories is justified given other constraints, and the impact on MNES will be minimal, short term and recoverable.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) ii)	Evaluation of the protocol to ensure it has included the requirements of 5l) ii).	Compliant		
Criterion 5l.iii)	iii. where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site the wells in proximity to cleared areas, or in areas of lower ecological condition such as previously disturbed or degraded areas; and	Section 7.6.4 of the Protocol states that when making decisions regarding the siting of infrastructure the following requirements must be satisfied - where development cannot avoid areas of MNES within sensitivity categories 2-4, preferentially avoid areas of MNES that constitutes an EPBC listed ecological community and/or may provide habitat for EPBC listed species, and site infrastructure in/or in proximity to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) iii)	Evaluation of the protocol to ensure it has included the requirements of 5l) iii).	Compliant		
Criterion 5l.iv)	iv. where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist.	Section 7.6.1 of the Protocol states that, where required, management areas, exclusion zones, and/or no impact zones surrounding areas of defined sensitivity categories will be determined on a site basis taking into account the written ecological advice of an approved ecologist.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) iv)	Evaluation of the protocol to ensure it has included the requirements of 5l) iv).	Compliant		
Note	Note: Directional drilling and multiple drill holes from one well pad are options to avoid well site and related infrastructure disturbance to sensitivity category 1-4.			Note this is not mandatory and is for information only.	This is not a requirement, hence it will not be audited in terms of compliance and non-compliance.		The Department requires further information/clarification as the audit should have established if these options were employed.	During the audit, wells were in sensitivity categories 5 or higher. Options relevant to categories 1-4 were not investigated as they were not encountered during the audit.
Criterion 5l	When siting non- linear infrastructure:			When siting non- linear infrastructure:				
Criterion 5l.i)	i) avoid development within sensitivity category 1 unless authorised in writing by the Department;	Section 7.6.4 of the Protocol states that when making decisions regarding the siting of infrastructure the following requirements must be satisfied - avoid development within areas mapped as ecological sensitivity category.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) i)	Evaluation of the protocol to ensure it has included the requirements of 5l) i).	Compliant		
Criterion 5l.ii)	ii) avoid development within sensitivity category 2-4, unless the location within any of these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable;	Section 7.6.4 of the Protocol states that when making decisions regarding the siting of infrastructure the following requirements must be satisfied - avoid development within ecological sensitivity category 2-4 unless the location within any of these sensitivity categories is justified given other constraints, and the impact on MNES will be minimal, short term and recoverable.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) ii)	Evaluation of the protocol to ensure it has included the requirements of 5l) ii).	Compliant		
Criterion 5l.iii)	iii) where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site infrastructure in or approximate to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas; and	Section 7.6.4 of the Protocol states that when making decisions regarding the siting of infrastructure the following requirements must be satisfied - where development cannot avoid areas of MNES within sensitivity categories 2-4, preferentially avoid areas of MNES that constitutes an EPBC listed ecological community and/or may provide habitat for EPBC listed species, and site infrastructure in/or in proximity to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) iii)	Evaluation of the protocol to ensure it has included the requirements of 5l) iii).	Compliant		
Criterion 5l.iv)	iv) where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist.	Section 7.6.1 of the Protocol states that, where required, management areas, exclusion zones, and/or no impact zones surrounding areas of defined sensitivity categories will be determined on a site basis taking into account the written ecological advice of an approved ecologist	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) iv)	Evaluation of the protocol to ensure it has included the requirements of 5l) iv).	Compliant		
Criterion 5l	When siting linear infrastructure:			When siting linear infrastructure:				
Criterion 5l.i)	i) avoid development within sensitivity category 1 unless authorised in writing by the Department;	Section 7.6.4 of the Protocol states that when making decisions regarding the siting of infrastructure the following requirements must be satisfied - avoid development within areas mapped as ecological sensitivity category	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) i)	Evaluation of the protocol to ensure it has included the requirements of 5l) i).	Compliant		
Criterion 5l.ii)	ii) avoid development within sensitivity category 2-4, unless their location within these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable;	Section 7.6.4 of the Protocol states that when making decisions regarding the siting of infrastructure the following requirements must be satisfied - avoid development within ecological sensitivity category 2-4 unless the location within any of these sensitivity categories is justified given other constraints, and the impact on MNES will be minimal, short term and recoverable	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) ii)	Evaluation of the protocol to ensure it has included the requirements of 5l) ii).	Compliant		
Criterion 5l.iii)	iii) where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site infrastructure in or approximate to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas; and	Section 7.6.4 of the Protocol states that when making decisions regarding the siting of infrastructure the following requirements must be satisfied - where development cannot avoid areas of MNES within sensitivity categories 2-4, preferentially avoid areas of MNES that constitutes an EPBC listed ecological community and/or may provide habitat for EPBC listed species, and site infrastructure in/or in proximity to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) iii)	Evaluation of the protocol to ensure it has included the requirements of 5l) iii).	Compliant		

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 5l.iv)	iv) where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist.	Section 7.6.1 of the Protocol states that, where required, management areas, exclusion zones, and/or no impact zones surrounding areas of defined sensitivity categories will be determined on a site basis taking into account the written ecological advice of an approved ecologist.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) iv)	Evaluation of the protocol to ensure it has included the requirements of 5l) iv).	Compliant		
Note	Note: Justification is reportable in accordance with condition 13 a) vii). The management plan requirements under condition 8 h) may also indicate that a species or its habitat can co-exist with specific types of gas field infrastructure and operations.	Section 7.7.2.1 of the Protocol states that actual disturbance to an MNES requires justification for the action taken to be recorded.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011		Review the protocol to determine if it includes measures in accordance with condition 13 a) vii) and management plan requirements under condition 8 h) in accordance with Note.	Compliant		
Criterion 5m	m. require the proponent to plan for and decide the extent that proposed linear infrastructure may have adverse impacts on MNES in accordance with the following:			Check the protocol includes 5m)	Evaluation of the protocol to ensure it has covered the requirements of 5m).			
Criterion 5m.i)	i. all linear disturbance within sensitivity category 1-4 for MNES and the impact risk zone must be:	Section 7.6.4.1 of the Protocol states that linear infrastructure within and 200m surrounding ecological sensitivity categories 1-4 where MNES is confirmed or presumed to be found must comply with the following limits on development	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	The protocol must ensure linear disturbance in cat 1-4 is:	Review the protocol to determine if it includes measures to must ensure linear disturbance in cat 1-4 is:	Compliant		
Criterion 5m.i)I	I. limited to 12 metres in width for a single flow line;	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) I	Evaluation of the protocol to ensure it has included the requirements of 5m.i) I.	Compliant		
Criterion 5m.i)II	II. limited to 18 metres in width for trenches with one water gathering line and one parallel gas gathering line;	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) II	Evaluation of the protocol to ensure it has included the requirements of 5m.i) II.	Compliant		
Criterion 5m.i)III	III. limited to 25 metres in width for multiple trenches where there are three parallel gas or water gathering lines or a single large diameter water pipeline (500mm or above);	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) III	Evaluation of the protocol to ensure it has covered the requirements of 5m.i) III.	Compliant		
Criterion 5m.i)IV	IV. limited to 30 metres in width for any single high pressure gas pipeline less than 750mm diameter;	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) IV	Evaluation of the protocol to ensure it has covered the requirements of 5m.i) IV.	Compliant		
Criterion 5m.i)V	V. limited to 40 metres in width for any single high pressure gas pipeline of diameter equal to or greater than 750mm diameter;	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) V	Evaluation of the protocol to ensure it has covered the requirements of 5m.i) V.	Compliant		
Criterion 5m.i)VI	VI. limited to an additional 7 metres for each additional trench for water or gas lines;	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) VI	Evaluation of the protocol to ensure if has covered the requirements of 5m.i) VI.	Compliant		
Criterion 5m.i)VII	VII) limited to an additional 10 metres for each additional high pressure gas pipeline or large diameter water pipeline (500mm or above);	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) VII	Evaluation of the protocol to ensure it has covered the requirements of 5m.i) VII.	Compliant		
Criterion 5m.i)VIII	VIII) limited to disturbance within identified infrastructure corridors;	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) VIII	Evaluation of the protocol to ensure it has covered the requirements of 5m.i) VIII.	Compliant		
Criterion 5m.i)IX	IX) where feasible, trenches, pipelines for associated water and other transmissions lines must be co-located to reduce total disturbance on MNES; and	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) IX	Evaluation of the protocol to ensure it has covered the requirements of 5m.i) IX.	Compliant		
Criterion 5m.i)X	X) co-location will not be implemented where an assessment has determined that it is likely to increase impacts to MNES.	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) X	Evaluation of the protocol to ensure it has covered the requirements of 5m.i) X.	Compliant		
Note	Note 1: These widths include provision for a utility corridor and access track.	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011		Review the protocol to determine if it specifies widths include provision for a utility corridor and access track in accordance with Note 1.	Compliant		
Criterion 5m.ii)	ii. In limited circumstances only (e.g. river crossings, where there are abnormal access constraints into a gas processing facility and when within close proximity to other proponent's linear infrastructure), increased corridor widths within areas of MNES may be required. In those circumstances a risk based site assessment will be completed to determine disturbance to MNES, identify management measures to minimise impacts to MNES and to justify the additional disturbance to MNES. The assessment will be available to the Department prior to any disturbance.	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.ii)	Evaluation of the protocol to ensure it has covered the requirements of 5m.ii)	Compliant		
Note	Note: Any area of a disturbance referred to in this condition would be subtracted from the disturbance limits specified elsewhere in these conditions.	Section 7.6.4.1 of the Protocol states that infrastructure planning and design must take into account current planned and actual disturbance and limits to disturbance set out in project approvals. New infrastructure must not be approved for development where this would cause disturbance limits to be exceeded.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011		Review the protocol to determine if the requirements of the note are addressed.	Compliant		
Criterion 5n	n. support bioregional corridors for listed threatened species and migratory species, and connectivity for listed threatened ecological communities;	Section 7.2 states that the scope of the pre-clearance field ecological assessment shall include consider constraints on infrastructure layout relevant to bioregional corridors including for EPBC listed threatened species, migratory species and connectivity for EPBC listed threatened ecological communities.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5n.)	Evaluation of the protocol to ensure it has covered the requirements of 5n.)	Compliant		
Criterion 5o	o. ensure site assessments and field ecological surveys:			The protocol must ensure site assessments and surveys:				
Criterion 5o.i)	i. are undertaken in accordance with the Department's survey guidelines in effect at the time of the survey. This information can be obtained from http://www.environment.gov.au/epbc/guidelines-policies.html#threatened;	Section 7.2 of the Protocol states that field ecology assessments of MNES must comply with SEWPAC survey guidelines and best practice survey methodology	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol includes 5o) i)	Conduct a review of the Protocol to ensure site assessments and field ecological surveys are undertaken in accordance with 5o) i).	Compliant		

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 5o.ii)	ii. take into account and reference previous ecological surveys undertaken in the area and relevant new information on likely presence or absence of MNES;	Section 7.1 of the Protocol states that the desktop assessment should, as a minimum, consider potential impacts on MNES including data from EPBC Protected Matters search results, previous ecological surveys undertaken in the area and relevant new information on likely presence or absence of MNES	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol includes 5o) ii)	Conduct a review of the Protocol which relates to site assessments and field ecological surveys and check if requirement 5o) ii) has been included.	Compliant		
Criterion 5o.iii)	iii. are undertaken by a suitably qualified ecologist approved by the Department for sensitivity categories 1-4;	Section 7.2 of the Protocol states that the pre-clearance assessment must be conducted by qualified persons approved by DSEWPaC if the areas proposed to be disturbed are identified to contain Ecological Sensitivity Mapping Categories 1 4	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol includes 5o) iii)	Conduct a review of the Protocol to ensure site assessments and field ecological surveys are undertaken in accordance with 5o) iii).	Compliant		
Criterion 5o.iv)	iv. are undertaken by a suitably qualified environment officer for sensitivity categories 5-7;	Section 7.2 of the Protocol states that assessment of Categories 5-7 will be conducted by a suitably qualified environmental officer.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol includes 5o) iv)	Conduct a review of the Protocol to ensure site assessments and field ecological surveys are undertaken in accordance with 5o) iv).	Compliant		
Criterion 5o.v)	v. document the survey methodology, results and significant findings in relation to MNES.	Section 7.2.2 of the Protocol states that the preliminary report should include a description of identified habitat for State or Commonwealth listed species or communities, including assessment of the quality of the habitat and its likelihood of supporting listed species, and notation of and other significant findings in relation to MNES or other findings of critical importance. The Protocol does not contain a requirement for the survey methodology to be documented.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol to ensure it includes 5o) v)	Conduct a review of the Protocol to ensure site assessments and field ecological surveys and check if 5o) v) has been included.	Not compliant		
Criterion 5o.vi)	vi. apply best practice site assessment and ecological survey methods appropriate for each listed threatened species, migratory species, their habitat and listed ecological communities as detailed in the Protocol; Note: Best practice includes applying the optimum timing and frequency of site assessments and surveys to determine presence of listed threatened species or migratory species or their habitat, or a listed threatened ecological community.	Section 7.2 of the Protocol states that field ecology assessments of MNES must comply with SEWPAC survey guidelines and best practice survey methodology	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol to ensure it includes 5o) vi)	Conduct a review of the Protocol to ensure site assessments and field ecological surveys and check if 5o) vi) has been included.	Compliant	The Department requires further information/clarification as to whether this note has been incorporated in the Protocol?	This note has been incorporated into Section 7.6.1 of the Protocol.
Criterion 5o.vii)	vii. apply the mapping of environmental constraints class sensitivity category 1-4; the infrastructure location requirements; minimum no impact zones; impact risk zones; and the width requirements for linear infrastructure corridors described in (m);	This is addressed in Section 7.6.1 of the Protocol.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol to ensure it includes 5o) vii)	Conduct a review of the section of the Protocol which relates to site assessments and field ecological surveys and check if 5o) vii) has been included.	Compliant		
Criterion 5o.viii)	viii. reports are published by the proponent on the internet 20 business days before clearance of native vegetation in an infrastructure impact area and provided to the Department on request;	Section 7.2.2 of the Protocol states that where MNES is present, reports will be published on the APLNG website 20 business days prior to clearance of native vegetation and provided to DSEWPaC on request	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol to ensure it includes 5o) viii)	Conduct a review of the section of the Protocol which relates to site assessments and field ecological surveys and check if 5o) viii) has been included.	Compliant		
Criterion 5p	p. require species and ecological community management plans which include:	Section 7.4 of the Protocol states that Species and Ecological Community Management Plans will be developed for MNES	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol to ensure it includes p)		Compliant		
Criterion 5p.i)	i. relevant avoidance and mitigation measures to be applied;	This is addressed in Section 7.4 of the Protocol.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol includes 5p) i)	Evaluation of the protocol to determine if 5p) i) has been included.	Compliant		
Criterion 5p.ii)	ii. measures for protecting each listed threatened species and migratory species and their habitat, and each listed threatened ecological community not previously assessed by the proponent, should one or more be found in the project area at any time over the life of the project. Any such management plans must be developed in a timeframe to be approved by the Department. Notification of additional MNES found must be provided to the Department in writing within 10 business days. Measures must include the development of a management plan consistent with requirements under condition 8;	This is addressed in Section 7.4 of the Protocol.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol includes 5p) ii)	Evaluation of the protocol to determine if 5p) ii) has been included.	Compliant		
Criterion 5q	q. ensure constraints planning and field development decisions are made in accordance with the Protocol (including any relevant species and ecological community management plans) before final selection of specific sites for gas field development within the project area.	Section 7.3 of the Protocol states that the scope of the pre-construction field environmental scout includes confirmation of the suitability of infrastructure layout in accordance with this Protocol and relevant species and threatened ecological community plans.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol includes 5q)	Evaluation of the protocol to determine if 5q) has been included.	Compliant		
Criterion 6	6.1 The Protocol must ensure relevant information on MNES is available and used by the proponent to support field development and management decisions throughout the life of the project.	Section 7.1 of the Protocol requires the desktop assessment to consider potential impacts on MNES including data from EPBC Protected Matters search results, previous ecological surveys undertaken in the area and relevant new information on likely presence or absence of MNES. This information is also provided to field scouts (Section 7.2.1)	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol includes the requirements of 6.	1. Review the Protocol to ensure the requirements of 6 have been addressed. 2. Hold discussions with stakeholder(s) to determine how relevant information on MNES has been and will continue to be used to support future field development and management decisions.	Compliant		

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 7 - split	Management Plans for Listed Species and Ecological Communities - 7.1 Before commencement of each major stage of gas field development the proponent must develop management plans for that area, which include:	The following plans have been developed by Australia Pacific LNG and approved by the Department of Sustainability, Environment, Water, Population and Communities (SEWPaC) (now Department of the Environment): -Threatened Fauna Management Plan -Threatened Flora Management Plan -Threatened Ecological Community Management Plan Approval letter states that the Protocol meets the requirements of conditions 7, 8, 9 and 10 of EPBC 2009/4974 for Stage 1 development. Early works commenced at the gas fields on 19 October 2011, following approval of the plans on 1 September 2011.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012 Letter from James Barker (SEWPaC) to Katherine Jack (Australia Pacific LNG) dated 1 September 2011. Australia Pacific LNG reference Q-LNG01-15-EA-0061 Email from Vicki Low (Australia Pacific LNG) to Dieter Kluger, subject DSEWPaC Weekly APLNG Activity Update, dates 5 December 2011.	Plans to be developed prior to commencement of each major stage of gas field development which include:	Hold discussions with key stakeholders and review supporting documentation to confirm that Management Plans for Listed Species and Ecological Communities have been developed for each major stage of the gas field development prior to the commencement of that stage.	Compliant		
Criterion 7 - split	7.2 Terrestrial ecology habitat management guidelines, addressing each listed species and listed ecological community that, as indicated through assessment or more recent information, may be potentially impacted by that stage of gas field development within the project area, or external to the project area.	Habitat descriptions are provided for each individual species in the TFMP. Fauna species with common management requirements have been grouped, with impact minimisation and management practices provided for each group. Section 1.1 of the TFMP states that "separate management plans will be submitted to SEWPaC should a listed fauna species which is not included in this TFMP be identified during the lifecycle of the gas field component of the project". Auditors advised that no additional specieis have been identified, therefore no separate management plans have been submitted.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	Terrestrial ecology habitat management guidelines, addressing requirements of 7.2	Evaluate management plans to determine the requirements of 7.2 have been addressed.	Compliant		
Criterion 7 - split	7.3 The management plans must address as a minimum, the ecological communities and species and their habitat as specified in **Tables 1, 2, and 3** of these conditions:	The Threatened Fauna Management Plan, Threatened Flora Management Plan and Threatened Ecological Community Management Plan contain all species listed in Tables 1, 2 and 3 of the EPBC Conditions	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	The plans must address ecological communities and species and their habitat as specified in Tables 1, 2, and 3 of these conditions.	Evaluation of management plans to determine if they address requirements of 7.3.	Compliant		
Notes	Note 1: The proponent may develop management plans to align with the requirements of the Queensland Government where there are species and ecological communities covered by both Queensland requirements and the requirements of this approval. Note 2: Major stages of development are to be notified under condition 90.	The Threatened Fauna Management Plan addresses overlapping species of the EPBC Act and the Queensland Nature Conservation Act 1992. An addendum to this plan has been developed which addresses additional NC Act Listed Species.	Threatened Fauna Management Plan Addendum Q-LNG01-15-MP-0113_01 Revision 0 10 October 2011	Discuss with Personnel if they have done this. Note this is not mandatory.	Discussions to be held with personnel to determine if they have done this. However this is not a requirement, hence it will not be audited in terms of compliance and non-compliance.			
Table 1	**Species Management Plans required before commencement**							
	Listed fauna species	**EPBC Act status**		**Independent Auditor Comments**	**Compliance Finding**			
	Dasyurus hallucatus (Northern Quoll)	Endangered	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Chalinolobus dwyeri (Large-eared Pied Bat, Large Pied Bat)	Vulnerable	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Nyctophilus timoriensis (South-eastern form) (Eastern Long-eared Bat)	Vulnerable	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Turnix melanogaster (Black-breasted Button-quail)	Vulnerable	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Erythrotriorchis radiatus (Red Goshawk)	Vulnerable	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Rostratula australis (Australian Painted Snipe)	Vulnerable	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Geophaps scripta scripta (Squatter Pigeon (Southern))	Vulnerable	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Pedionomus torquatus (Plains-wanderer)	Vulnerable	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Lathamus Discolor (Swift Parrot)	Endangered	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Delma torquata (Collared Delma)	Vulnerable	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Adclarkia dawsonensis (Boggomoss Snail)	Critically endangered	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Listed flora species	**EPBC Act status**						
	Eriocaulon carsonii (Salt Pipewort)	Endangered	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant			
	Xerothamnella herbacea (Herbaceous xerothamnella)	Endangered	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant			
	Tylophora linearis (Slender tylophora)	Endangered	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant			

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
	Microcarpaea agonis (Microcarpea)	Endangered	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant			
	Prostanthera sp. Dunmore (Dunmore mint- bush)	Vulnerable	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant			
	Acacia currani (Curly-barked Wattle)	Vulnerable	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant			
	Acacia lauta (Tara Wattle)	Vulnerable	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant			
	Calytrix gurulmundensis (Gurulmundi fringe myrtle)	Vulnerable	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant			
	Eucalyptus virens (Shiny-leaved ironbark)	Vulnerable	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant			
	Pterostylis cobarensi s (Cobar greenhood orchid)	Vulnerable	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant			
	Homopholis belsonii (Belson's panic grass)	Vulnerable	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant			
	Philotheca sporadica (The waxflower)	Vulnerable	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant			
	Cadellia pentastylis (Ooline)	Vulnerable	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant			
	Listed migratory species	**EPBC Act status**						
	Hirundapus caudacutus (White-throated needletail)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Apus pacificus (Fork-tailed swift)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Ardea alba/Ardea modesta (Eastern great egret/great or white egret)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Bubulcus ibis/ Ardea ibis (Cattle egret)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Plegadis falcinellus (Glossy Ibis)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Pandion haliaetus/Pandion cristatus (Eastern Osprey)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Haliaeetus leucogaster (White-bellied sea-eagle)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Pluvialis fulva (Pacific golden plover)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Rostratula australis (Australian painted snipe)	Vulnerable / Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Gallinago hardwickii (Latham's snipe)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Gallinago hardwickii (Latham's snipe)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Limosa limosa (Black-tailed godwit)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Limosa lapponica (Bar-tailed godwit)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Numenius phaeopus (Whimbrel)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Tringa nebularia (Common greenshank)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Tringa stagnatilis (Marsh sandpiper)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Actitis hypoleucos (Common sandpiper)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Calidris acuminata (Sharp-tailed sandpiper)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Tringa glareola (Wood sandpiper)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Calidris ruficollis (Red-necked stint)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Calidris ferruginea (Curlew sandpiper)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Philomachus pugnax (Ruff)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Sterna caspia /Hydroprogne caspia (Caspian tern)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Merops ornatus (Rainbow bee-eater)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Anthochaera phrygia (Regent honeyeater)	Endangered / Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Rhipidura rufifrons (Rufous fantail)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Monarcha melanopsis (Black-faced monarch)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
	Myiagra cyanoleuca (Satin flycatcher)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Acrocephalus australis/A. stentoreus (Australian reed-warbler/Clamorous Reed-Warbler)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant			
	Note: Table 1 is derived from Volume 2: Gas Fields, Chapter 23: Matters of National Environmental Significance including Section 23.4 EPBC Act significant impact criteria assessment; Section 23.5 Threatened Species; Table 23.3 Likely occurrence of threatened flora species within the study area; Table 23.4 Likely occurrence of threatened terrestrial fauna species within the study area; Section 23.6 Listed migratory species; and Table 23.5 Likely occurrence of migratory terrestrial species within the study area of the APLNG EIS of March 2010; and from listed threatened species profiles available on the Department's website.			Note this is not mandatory and is for information only.	This is not a requirement, hence it will not be audited in terms of compliance and non-compliance.			
Table 2	**Disturbance limits for listed threatened ecological communities**							
	Ecological community	**EPBC Act status**	**Disturbance limit (ha)**	**Independent Auditor Comments**	**Compliance Finding**			
	Brigalow (*Acacia harpophylla* dominant and co-dominant)	Endangered	94.61 ha	This community is included in the Threatened Ecological Community Management Plan	Compliant			
	Weeping Myall Woodland	Endangered	0 (No disturbance authorised)	This community is included in the Threatened Ecological Community Management Plan	Compliant			
	The community of native species dependent on natural discharge of groundwater from the Great Artesian Basin	Endangered	0 (No disturbance authorised)	This community is included in the Threatened Ecological Community Management Plan	Compliant			
	Semi-evergreen vine thickets of the Brigalow Belt (North and South) and Nandewar Bioregions	Endangered	4.91 ha	This community is included in the Threatened Ecological Community Management Plan	Compliant			
	Natural Grasslands of the Queensland Central Highlands and the northern Fitzroy Basin	Endangered	0 (No disturbance authorised)	This community is included in the Threatened Ecological Community Management Plan	Compliant			
	Note: Table 2 is derived from the Australia Pacific LNG Environmental Offset Strategy of 16 November 2010; Volume 2: Gas Fields, Chapter 23: Matters of National Environmental Significance including Section 23.4 EPBC Act significant impact criteria assessment of the APLNG EIS of March 2010; and from listed ecological community profiles available on the Department's website.			Note this is not mandatory and is for information only.	This is not a requirement, hence it will not be audited in terms of compliance and non-compliance.			
Table 3	**Disturbance limits for listed species**							
	Species	**EPBC Act status**	**Disturbance limit (ha)**	**Indicative Habitat**	**Requirement**	**Verification Method**		
	Egernia rugosa (Yakka Skink)	Vulnerable	73.44* ha of potential habitat	Open dry sclerophyll forest or woodland, Brigalow, shrublands, lancewood forests on sandy and open textured soils. Dense ground cover, cavities in soil-bound root systems of fallen trees and beneath rocks, hollow logs and animal burrows are considered to provide suitable microhabitat for this species.	This species is included in the Threatened Fauna Management Plan	Review Plans to ensure species are addressed		
	Furina dunmalli (Dunmall's Snake)	Vulnerable	262.49* ha of potential habitat	Brigalow (Acacia harpophylla) forest and woodland growing on cracking black clay and clay loam soils (usually on heavy clay soils). Also known to occur in eucalypt and callitris woodland with fallen timber and ground litter.	This species is included in the Threatened Fauna Management Plan	Review Plans to ensure species are addressed		
Note	* Disturbance limits for Yakka Skink and Dunmall's Snake potential habitat are derived as per the fauna habitat reduction methodology applied in Australia Pacific LNG - Fauna habitat Calculations for the Gas Fields Q-LNG01-15-RP-0014 of 16 November 2010.			Note this is not mandatory and is for information only.	This is not a requirement, hence it will not be audited in terms of compliance and non-compliance.			
Note 1	Note 1: Table 3 is derived from Volume 2: Gas Fields, Chapter 23: Matters of National Environmental Significance including Section 23.4 EPBC Act significant impact criteria assessment of the APLNG EIS of March 2010; Australia Pacific LNG - Fauna habitat Calculations for the Gas Fields Q-LNG01-15-RP-0014 of 16 November 2010; and from listed threatened species profiles available on the Department's website.			Note this is not mandatory and is for information only.	This is not a requirement, hence it will not be audited in terms of compliance and non-compliance.			
Note 2	Note 2: Habitat for species in Table 3 will be described in the management plan for each species as required under condition 8. The habitat described in Table 3 is indicative only.	Section 9.9 of the Threatened Fauna Management Plan describes habitat for the Yakka Skink. Section 9.11 of the TFMP describes habitat for Dunmall's snake.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	Check that description of habitat for species in Table 3 have been included.	Review Plans to ensure Note 2 is addressed	Compliant		
Criterion 8	The management plans required under condition 7 must be developed by a qualified ecologist approved in writing by the Department and as a minimum address the following as relevant to each MNES:	The TFMP, TFLMP and TECMP were approved by the Department on 1 September 2011 as meeting conditions 5(h&p), and 7 to 10. The TFMP, TFLMP and TECMP were authored by Richard Floyd, of Unidel who were approved by the Department to undertake the development of these plans on 28 June 2011.	Letter from James Barker (SEWPaC) to Katherine Jack (Australia Pacific LNG) dated 1 September 2011. Australia Pacific LNG reference Q-LNG01-15-EA-0061 Letter from James Barker to Katherine Jack dated 28 June 2011, Company Approval or ecologists	Condition 7 plans to be prepared by qualified ecologist approved in writing by the Department and include MNES info listed below:	Review qualifications of the ecologists who have developed the plans to determine if they are appropriately qualified. Sighting letters or emails from the Dept approving people who prepared management plans.	Compliant		

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 8a	a. current legal status (under EPBC Act);	The TFMP, TFLMP and TECMP are structured to reflect condition 8. Each species includes the requirements of 8a.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Management Plan(s) include 8)a)	Review Plan to ensure it includes 8) a).	Compliant		
Criterion 8b	b. known distribution;	The TFMP, TFLMP and TECMP are structured to reflect condition 8. Each species includes the requirements of 8b.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Management Plan(s) include 8) b)	Review Plan to ensure it includes 8) b).	Compliant		
Criterion 8c	c. known species' populations and their relationships within the region;	The TFMP and TFLMP are structured to reflect condition 8. Each species includes the requirements of 8c.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	Check Management Plan(s) include 8) c)	Review Plan to ensure it includes 8) c).	Compliant	The Department requires further information/clarification as to whether the audit comments should also reference the TECMP?	TECMP does not refer to specific species, therefore this condition is not required to be addressed in the TECMP. The requirements of this condition are addressed in the TFMP and TMFLMP.
Criterion 8d	d. extent of ecological community fragmentation within the region and if appropriate minimum patch size for that community;	The TECMP is structured to reflect condition 8. Each species includes the requirements of 8d.	Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Management Plan(s) include 8) d)	Review Plan to ensure it includes 8) d).	Compliant		
Criterion 8e	e. to support field identification and ecological surveys, description of the relevant characteristics of the ecological community;	The TFLMP and TECMP are structured to reflect condition 8. Each species includes the requirements of 8e.	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Management Plan(s) include 8) e)	Review Plan to ensure it includes 8) e).	Compliant		
Criterion 8f	f. species' biology, reproduction and description of general habitat;	The TFMP, TFLMP and TECMP are structured to reflect condition 8. Each species includes the requirements of 8f.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Management Plan(s) include 8) f)	Review Plan to ensure it includes 8) f).	Compliant		
Criterion 8g	g. to support field identification and ecological surveys, description of the species' habitat, which may be described in terms of essential habitat and microhabitat, associations with geology, soils, landscape features, associations with other native fauna and/or flora or ecological communities, and specific niche habitat descriptions;	The TFMP, TFLMP and TECMP are structured to reflect condition 8. Each species includes the requirements of 8g.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Management Plan(s) include 8) g)	Review Plan to ensure it includes 8) g).	Compliant		
Note	Note: Constraints mapping may be limited by available data for many species and may therefore be inadequate to map habitat requirements for planning and management purposes, or to indicate presence without on ground assessment. Condition 8(g) requires the essential components of a species' habitat to be described where relevant to support field identification and environmental constraints decision making. This should include essential habitat components for widely distributed species present in low numbers and for other species likely to be present but not often observed.	Habitat for each species in the TFMP is described in terms of general habitat, regional ecosystems and essential microhabitat features. Habitat for each species/community in the TFLMP and TECMP is provided as per condition 8g, however it does not have the same subsections as the TFMP.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Condition 8g is to support field identification and ecological surveys by describing essential components of a species' habitat	Review Plans and supporting documents to ensure they include descriptions of essential components of a species' habitat..	Compliant		
Criterion 8h	h. threats to MNES relating to the development and management of land within the gas fields including from the development, operation and decommissioning of infrastructure within the gas fields; and from groundwater extraction and aquifer depressurisation, CSG water use and disposal, whether the threat is within or outside the gas field development area;	The TFMP, TFLMP and TECMP are structured to reflect condition 8. Each species includes the requirements of 8h.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Management plans for 8) h)	Review management plans developed for Condition 8 and verify that h) has been addressed.	Compliant		
Note	Note: This part of a management plan may also indicate that a species or its habitat can co-exist with specific types of gas field operations.			Note this is not mandatory and is for information only.	This is not a requirement, hence it will not be audited in terms of compliance and non-compliance.			
Criterion 8i	i. relevant management practices and methods to minimise impact and recover from impact that should include:	Fauna and flora species with common management requirements have been grouped, with impact minimisation and management practices provided for each group.		Check if plans include relevant practices and methods as required	Review plans to ensure it includes 8) i).			
Criterion 8i.i)	i. site rehabilitation timeframes, standards and methods;	This is addressed in Section 1.11 of the TFMP, TFLMP and TECMP.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Plans for 8) i.) i). Note this is not a must and therefore optional.	Check if management plans include 8) i.) i).	Compliant	The Department requires further information/clarification as to whether the section reference is the same for the TFLMP and TECMP?	This is addressed in Section 1.11 of the TFMP, Section 1.11 of the TFLMP and Section 1.11 of the TECMP.

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 8i.ii)	ii. use of sequential clearing to direct fauna away from an impact zone;	Addressed under the relevant management practices section for each grouped species in the TFMP.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	Check Plans for 8) i.) ii). Note this is not a must and therefore optional.	Check if management plans include8) i.) ii).	Compliant		
Criterion 8i.iii)	iii. re-establishment of native vegetation in linear infrastructure corridors;	Monitoring of reestablishment is addressed in Section 1.12 of the TFLMP and Section 1.11 of the TECMP.	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Plans for 8) i.) iii). Note this is not a must and therefore optional.	Check if management plans include 8) i.) iii).	Compliant		
Criterion 8i.iv)	iv. welfare and safe handling of fauna specimens requiring relocation from impact sites;	Addressed in Section 1.9 of the TFMP - Statement No. 9 Policy for the Translocation of Threatened Fauna in NSW - Should a relevant Queensland policy come into effect during the implementation period of this TFMP it will be used in place of the New South Wales guidelines.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	Check Plans for 8) i.) iv). Note this is not a must and therefore optional.	Check if management plans include 8) i.) iv).	Compliant		
Criterion 8i.v)	v. handling practices for flora specimens;	Section 1.9 of the TFLMP states that Approved ecologists will have the relevant permits required to collect flora specimens in QLD and will handle the specimens in accordance with those permits. Section 3 of the TECMP states that the handling of flora specimens (seeds, cuttings or other propagules) will be done in accordance with Vallee et.al. (2004) Guidelines for the Translocation of Threatened Plants in Australia - Second Edition.	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Plans for 8) i.) v). Note this is not a must and therefore optional.	Check if management plans include 8) i.) v).	Compliant		
Criterion 8i.vi)	vi. translocation practices and monitoring for translocation success;	Section 3 of the TFLMP states that a propagation and rehabilitation program/management plan will be developed for any individuals of threatened flora which cannot be avoided and that have been identified as able to be translocated. Section 1.10 of the TECMP states that no translocation of TECs will be undertaken.	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Plans for 8) i.) vi). Note this is not a must and therefore optional.	Check if management plans include 8) i.) vi).	Compliant		
Criterion 8h.vii)	vii. monitoring methods including for rehabilitation success and recovery;	This is addressed in Section 1.11 of the TFMP, TFLMP and TECMP.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Plans for 8) i.) vii). Note this is not a must and therefore optional.	Check if management plans include 8) i.) vii).	Compliant	The Department requires further information/clarification as to whether the section reference is the same for the TFLMP and TECMP?	This is addressed in Section 1.11 of the TFMP, Section 1.11 of the TFLMP and Section 1.11 of the TECMP.
Criterion 8j	j. surface and ground water quality and quantity requirements, including relevant downstream environmental quality parameters;	The TFMP, TFLMP and TECMP contain a cross reference to Surface Monitoring and Water Management Plan (SMWMP) (Appendix D to Q-LNG01-95-MP-0147). Groundwater monitoring is not addressed in either the TFMP or TFLMP. The TECMP refers to communities which are unlikely to be affected by project impacts on groundwater. There are no known occurrences of the community of native species dependent on natural discharge of groundwater from the Great Artesian Basin (Section 2.3 of the TECMP) and the EIS concluded that drawdown associated with gas field activities is not expected to significantly alter groundwater discharge volumes to springs located in the vicinity of the APLNG Project.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check the management plan(s) includes 8j	Review management plan(s) to ensure it has included the requirements of 8j.	Not compliant		
Criterion 8k	k. reference relevant conservation advice, recovery plans, or other policies, practices, standards or guidelines relevant to MNES published or approved from time to time by the Department.	The TFMP, TFLMP and TECMP are structured to reflect condition 8. Each species includes the requirements of 8k.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check management plan(s) for 8k	Review management plan(s) to ensure it has included the requirements of 8k.	Compliant		
Notes	Note 1: The management plans must include sufficient detail to inform field development decisions, ongoing management and decommissioning, and management external to the project area to minimise impacts on MNES through the life of the project. Note 2: To the extent that the requirements of condition 8 are satisfied for each species, a single plan may be prepared to address a group of species which have similar ecological characteristics and habitat needs. Other conditions also require species or ecological community management plans to be developed in certain circumstances in accordance with condition 8.	The species management plans contain detail on legal status, known distribution, known populations/relationships in the region, biology, habitat, threats and management practices. The auditors consider that this is sufficient detail to inform field decision regarding interaction with MNES on the Project.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check the management plan(s) address the requirements of Note 1	Plan(s) sighted and reviewed by auditors.	Compliant		
Criterion 9 - split	9.1 Each species and ecological community management plan must be submitted for the approval of the Minister.	The species and ecological community management plans were submitted to the Department of Sustainability, Environment, Water, Population and Communities. The plans were approved by James Barker (delegate of the Minister) by letter on 1 September 2011.	Letter from James Barker (SEWPaC) to Katherine Jack (Australia Pacific LNG) dated 1 September 2011. Australia Pacific LNG reference Q-LNG01-15-EA-0061	Check each species and ecological community management plan has been submitted to the Minister for approval .	Verify that requirements of 9.1 have been met via documentation and discussion.	Compliant		

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 9 - split	9.2 Commencement of each major stage of gas field development within the project area must not occur without written approval of a plan for addressing each listed species and ecological community within the proposed area of development.	The following plans have been developed by Australia Pacific LNG and approved by the Department of Sustainability, Environment, Water, Population and Communities (SEWPaC) (now Department of the Environment): -Threatened Fauna Management Plan -Threatened Flora Management Plan -Threatened Ecological Community Management Plan Approval letter states that the Protocol meets the requirements of conditions 7, 8, 9 and 10 of EPBC 2009/4974 for Stage 1 development. Early works commenced at the gas fields on 19 October 2011, following approval of the plans on 1 September 2011. The project has not commenced the next major stage at the time of the audit.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012 Letter from James Barker (SEWPaC) to Katherine Jack (Australia Pacific LNG) dated 1 September 2011. Australia Pacific LNG reference Q-LNG01-15-EA-0061 Email from Vicki Low (Australia Pacific LNG) to Dieter Kluger, subject DSEWPaC Weekly APLNG Activity Update, dates 5 December 2011.	Check if commencement of each major stage of gas field development within the project area occurred following written approval of a plan for each listed species and ecological community within the proposed area of development.	Verify the commencement of gas field development occurred in accordance with 9.2 via written letters, emails, documentation with the Department.	Compliant		
Criterion 9 - split	9.3 The proponent may undertake activities that are critical to commencement that are associated with mobilisation of plant and equipment, materials, machinery and personnel prior to the start of development only if such activities will have no adverse impact on MNES, and only if the proponent has notified the Department in writing before an activity is undertaken.	Auditors advised that no significant works were undertaken prior to the start of development. Pre-development works were limited to activities such as field scouting.		Check the Proponent has undertaken activities critical to commencement that are associated with mobilisation of plant and equipment, materials, machinery and personnel only if it is determined that the activities have no adverse impact on MNES and only once the Department has been notified in writing.	Determine if activities were undertaken in accordance with the requirements of 9.3 via review of documentation, discussions with stakeholders etc.	Compliant		
Criterion 9 - split	9.4 Approved species and ecological community management plans must be implemented.	Refer to SSMP Checklist	Refer to SSMP Checklist	Approved species and ecological community management plans must be implemented.	1. Obtain evidence to show that key elements of each approved species and ecological community management plan have been implemented (refer to management plan checklist). 2. Conduct site visits to determine if species and ecological community management plans have been implemented.	Refer to Condition 8 Implementation checklist		
Criterion 10 - split	10.1 The proponent must establish a program for routine review of the species and ecological community management plans to be undertaken by a qualified ecologist approved by the Department (with other experts as appropriate)	Section 1.4 of the TFMP, TFLMP, and TECMP states that the plan applies to each of the gas field development stages and will be reviewed every five years in alignment with the design of the five year staging for the gas field development. The five year review will be undertaken earlier if the staging timeframe is shortened or if new studies, management plans, or legislation come into effect that may be relevant.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check management plans include a program for routine review to be conducted by a qualified ecologist approved by the Department (with other experts as appropriate)	1. Obtain evidence to determine if the species and ecological community management plans are routinely reviewed. 2. by a qualified ecologist approved by the Department.	Compliant	The Department requires further information/clarification as to whether the section reference is the same for the TFLMP and TECMP? Further, the Department requires further information/clarification as to when the five year timeframe for review of the plan(s) will be triggered?	Section 1.4 of the TFMP, Section 1.4 of the TFLMP, and Section 1.4 of the TECMP states that the plan applies to each of the gas field development stages and will be reviewed every five years in alignment with the design of the five year staging for the gas field development. The five year review will be undertaken earlier if the staging timeframe is shortened or if new studies, management plans, or legislation come into effect that may be relevant.
Criterion 10 - split	10.2 Review must take into account any new information available to the proponent, including any information and advice provided by Commonwealth or Queensland Government agencies, or available from other CSG proponents.	Section 1.4 of the TFMP, TFLMP, and TECMP states that the five year review will be undertaken earlier if the staging timeframe is shortened or if new studies, management plans, or legislation come into effect that may be relevant.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Evidence to verify revisions take into account any new information available to the proponent including information provided by government agencies, fellow CSG companies.	Review evidence to determine if new information is taken into account by the Proponent during the review process.	Compliant		
Criterion 11	11. The Minister may require, by a request in writing, the periodic review of the species and ecological community management plans, either by the Department; or alternatively by an independent qualified ecologist, or other experts, approved by the Department.	Australia Pacific LNG has advised that no request for a review has been made by the Minister.		Check if such a request to has been made. Determine if the reviewer was approved by the Department.	1. Check to see if the Minister has requested a periodic review of the species and ecological community management plans. 2. Review evidence to determine if the reviewer was approved by the Department.	Not applicable		
Criterion 12 - split	12.1 Independent review of plans will be at the financial expense of the proponent.	Australia Pacific LNG has advised that no independent review had been required at the time of the audit.		If appropriate, check that the financial expense of the independent review was borne by the Proponent.	If appropriate, review evidence to determine if any reviews of the species and ecological community management plans were at the financial expense of the Proponent.	Not applicable		
Criterion 12 - split	12.2 Once independently reviewed, plans must be submitted for written approval by the Department.	Australia Pacific LNG has advised that no independent review had been required at the time of the audit.		Check that plans are submitted for written approval by the Department.	Review evidence to determine if independently reviewed plans were submitted to the Department for approval.	Not applicable		
Criterion 12 - split	12.3 Approved plans must be implemented.	Refer to Condition 8 Implementation Checklist	Refer to Condition 8 Implementation Checklist	Check that approved plans are implemented.	1. Obtain evidence to show that key elements of each approved species and ecological community management plan have been implemented (refer to management plan checklist). 2. Conduct site visits to determine if species and ecological community management plans have been implemented.			
Criterion 13	13. If an impact occurs (which may include a presumed impact where the species is presumed to be present) to a MNES during gas field development, operation, or decommissioning the proponent must:	Disturbance to TECs are recorded as disturbances to MNES. Disturbance to potential habitat for listed fauna is not recorded and it is understood this is the subject of ongoing negotiations between Origin and the Department.						
Criterion 13a	a. record the impact by reference to:			Document the impact:				
Criterion 13a.i)	i. the location, specific site and type of infrastructure or activity;	The location, specific site and type of activity is recorded in a spreadsheet (sighted). This is linked to GIS data, with the corresponding figures viewed by the auditors.	TEC disturbance spreadsheet sighted, including GIS register and related figures.	Evidence to verify records include information specified in Condition 13) a) i)	Review evidence to determine if impacts to MNES during gas field development, operation or decommissioning have been recorded in accordance with 13) a) i).	Compliant	If potential habitat for listed fauna is not being recorded the Department considers that this constitutes non-compliance.	The location, specific site and type of activity is recorded in a spreadsheet (sighted). This is linked to GIS data, with the corresponding figures viewed by the auditors.
Criterion 13a.ii)	ii. each MNES subject to disturbance;	Disturbance to TECs are recorded as disturbances to MNES. Disturbance to potential habitat for listed fauna is not recorded and it is understood this is the subject of ongoing negotiations between Origin and the Department.	TEC disturbance spreadsheet sighted, including GIS register and related figures.	Evidence to verify records include information specified in Condition 13) a) ii)	Review evidence to determine if impacts to MNES during gas field development, operation or decommissioning have been recorded in accordance with 13) a) ii).	Not compliant		

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 13a.iii)	iii. the related site assessment or field ecological survey documentation and recommendations, or the decision that the particular MNES was presumed to be present;	The ecology assessments and pre-clearance surveys are not referenced specifically against the record of disturbance.	TEC disturbance spreadsheet sighted, including GIS register and related figures.	Evidence to verify records include information specified in Condition 13) a) iii)	Review evidence to determine if impacts to MNES during gas field development, operation or decommissioning have been recorded in accordance with 13) a) iii).	Not compliant		
Criterion 13a.iv)	iv. the disturbance limit set under condition 25;	Disturbance to TECs are recorded as disturbances to MNES. Disturbance to potential habitat for listed fauna is not recorded and it is understood this is the subject of ongoing negotiations between Origin and the Department.	TEC disturbance spreadsheet sighted, including GIS register and related figures.	Evidence to verify records include information specified in Condition 13) a) iv)	Review evidence to determine if impacts to MNES during gas field development, operation or decommissioning have been recorded in accordance with 13) a) iv).	Not compliant		
Criterion 13a.v)	v. the total area of actual disturbance;	Disturbance to TECs are recorded as disturbances to MNES. Disturbance to potential habitat for listed fauna is not recorded and it is understood this is the subject of ongoing negotiations between Origin and the Department.	TEC disturbance spreadsheet sighted, including GIS register and related figures.	Evidence to verify records include information specified in Condition 13) a) v)	Review evidence to determine if impacts to MNES during gas field development, operation or decommissioning have been recorded in accordance with 13) a) v).	Not compliant		
.	vi. the remaining disturbance limit for each affected MNES;	Disturbance to TECs are recorded as disturbances to MNES. Disturbance to potential habitat for listed fauna is not recorded and it is understood this is the subject of ongoing negotiations between Origin and the Department.	TEC disturbance spreadsheet sighted, including GIS register and related figures.	Evidence to verify records include information specified in Condition 13) a) vi)	Review evidence to determine if impacts to MNES during gas field development, operation or decommissioning have been recorded in accordance with 13) a) vi).	Not compliant		
Criterion 13a.vii)	vii. the reasons for the decision including justification for the action taken, description of the efforts taken to avoid impact, and explanation why other constraints might justify the impact on MNES;	Justification for phase one has been recorded in squad checks (gated design refinement). Future disturbance justification is to be recorded in a TEC drawdown approval process. Squad checks sighted for the following infrastructure: -CMN153-1 -CMN170-2 -CMN236-2 -CMN280-1 -CMN263-3 -CMN281-3 -CMN153 -CMN194 -CMN255 -CMN280	EPBC squad check justification spreadsheet for TEC disturbance in Combabula pressure zone 2A, Golden RG, Griffin BC, Pressure Zones 0A-4 and 1A-2 (Location visited during site audit).	Evidence to verify records include information specified in Condition 13) a) vii)	Review evidence to determine if impacts to MNES during gas field development, operation or decommissioning have been recorded in accordance with 13) a) vii).	Compliant	If potential habitat for listed fauna is not being recorded the Department considers that this constitutes **non-compliance**.	Justification for phase one has been recorded in squad checks (gated design refinement). Future disturbance justification is to be recorded in a TEC drawdown approval process. Squad checks sighted for the following infrastructure: -CMN153-1 -CMN170-2 -CMN236-2 -CMN280-1 -CMN263-3 -CMN281-3 -CMN153 -CMN194 -CMN255 -CMN280
Criterion 13a.viii)	viii. actions and commitments by the proponent to remediate, rehabilitate, or make good any unauthorised disturbance; and	Auditors advised that no unauthorised disturbance has occurred to matters of national environmental significance. A compliance register was sighted by the auditors, however this was limited to incidents open at the time of the audit.	Extract from OCIS Compliance Register, most recent entry from February 2014.	Evidence to verify records include information specified in Condition 13) a) viii)	Review evidence to determine if impacts to MNES during gas field development, operation or decommissioning have been recorded in accordance with 13) a) viii).	Compliant	The Department requires further information/clarification as both closed and open compliance incidents should have been reviewed to ground-truth the statement that no unauthorised disturbance to MNES has occurred. If potential habitat for listed fauna is not being recorded the Department considers that this constitutes non-compliance	A compliance register was sighted by the auditors. It was previously misunderstood to be limited to incidents open at the time of the audit, however, clarification was provided by Australia Pacific LNG that the compliance register covers all incident / compliance records relevant to MNES irrespective of status (open / closed). Unauthorised disturbance has occurred to matters of national environmental significance according to
Note	Note: This condition applies to any adverse impact on MNES, whether or not a disturbance limit has been set, and whether or not the impact has been decided by the proponent under the Protocol based on other physical constraints.			This is for information and clarification purposes.	This is for information and clarification purposes.			
Criterion 13b	b. record the information to a standard which can be independently audited.	The TEC spreadsheet incorporating GIS attributes is auditable for disturbance calculations. The justification for disturbance is recorded separately. Documentation for two properties where TEC disturbance was observed was requested for review by the auditors.	EPBC squad check justification spreadsheet for TEC disturbance in Combabula pressure zone 2A, Golden RG, Griffin BC, Pressure Zones 0A-4 and 1A-2 (Location visited during site audit).	Evidence to verify information was available and of a standard to allow it to be independently audited.	Review evidence to determine if information is clear, available, traceable and recorded in a timely manner etc. to allow it to be independently audited.	Compliant	As records are not being maintained to confirm that extent of actual clearing of potential habitat for fauna species the Department considers that this constitutes non-compliance with the requirement to maintain records that can be independently audited.	This is considered to be a sub-condition of condition 13 and a compliance evaluation independent of the other sub-conditions has been given. The auditors note that decisions relating to disturbance of potential habitat have not been recorded, however this sub-condition relates to the auditability of the

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
EPBC 2009/4974 Condition 20	Approval and Review of Protocol - The Protocol must be submitted for the approval of the Minister. Commencement of gas field development must not occur without written approval of the Protocol. The approved Protocol must be implemented							
Criterion 20 - split	Approval and Review of Protocol - 20.1 The Protocol must be submitted for the approval of the Minister.	The Protocol was submitted to the Department of Sustainability, Environment, Water, Population and Communities. The Protocol was approved by James Barker (delegate of the Minister) by letter on 1 September 2011.	Letter from James Barker (SEWPaC) to Katherine Jack (Australia Pacific LNG) dated 1 September 2011. Australia Pacific LNG reference Q-LNG01-15-EA-0061	Check that the Protocol was submitted to the Minister for approval.	Review evidence to determine if the Protocol was submitted to the Minister for approval.	Compliant		
Criterion 20 - split	20.2 Commencement of gas field development must not occur without written approval of the Protocol.	The Protocol was issued as final on 31 August 2011. No amendments to the Protocol had been made at the time of the audit. The Protocol was approved by letter on 1 September 2011. Early works commenced at the gas fields on 19 October 2011.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011 Email from Vicki Low (Australia Pacific LNG) to Dieter Kluger, subject DSEWPaC Weekly APLNG Activity Update, dates 5 December 2011. Letter from James Barker (SEWPaC) to Katherine Jack (Australia Pacific LNG) dated 1 September 2011. Australia Pacific LNG reference Q-LNG01-15-EA-0061	Check if commencement of gas field development occurred following written approval of the Protocol.	Sighting Protocol and approval letter from the Dept, with comparison between when commencement started and approval was received.	Compliant		
Criterion 20 - split	20.3 The approved Protocol must be implemented.	Refer to Protocol Checklist	Refer to Protocol Checklist	Check that approved Protocol is implemented.	1. Obtain evidence to show that the commitments contained within the Protocol have been implemented. 2. Conduct site visits to determine if Protocol has been implemented.			
Criterion 21 - split	Constraints Planning and Field Development Protocol Review - 21.1 The Protocol and related plans must be reviewed and updated by the proponent to take into account the findings of Cumulative Impact Assessment Reports required by the Queensland Government before each major stage of the proponent's gas field development; or following a written request from the Department.	This requirement is noted in Section 9 of the Protocol. The gas field is currently in the first stage (first five years) of development. No updates to the Protocol have been made, and no requests have been received from the Department.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check that the Protocol and related plans were reviewed and updated by the proponent to take into account the findings of the Cumulative Impact Assessment Report before each major stage of the proponent's gas field development; or following a written request from the Department.	Review evidence to determine if the Protocol and related plans were reviewed and updated to take into account the requirements of 21.1	Not applicable		
Criterion 21 - split	21.2 Reviewed and updated Protocols and plans must be submitted for the Minister's written approval.	No updates to the Protocol have been made, and no requests have been received from the Department.		Check that reviewed and updated Protocols and plans were submitted for the Minister's written approval.	Review evidence to determine if the reviewed and updated Protocol and plans were submitted to the Minister for approval.	Not applicable		
Criterion 21 - split	21.3 Once approved, updated Protocols and plans must be implemented.	No updates to the Protocol have been made. Refer to condition 20 for assessment of implementation of the current Protocol.		Check that approved Protocols and plans were implemented.	Review evidence to determine if the current approved versions of the Protocol and ecological community management plan(s) were implemented.	Not applicable		
Note 1	Note 1: relevant studies include the Queensland Water Commission Cumulative Groundwater Model for the Surat and South Bowen Basin and findings of the CSG Industry Monitoring Group (CIMG).			This is for information and clarification purposes only.	This is for information and clarification purposes only.			
Note 2	Note 2: The review required following completion of the Cumulative Impact Assessment Report required by the Queensland Government may be done after approval of the Protocol. The Department may seek review of the Protocol to align with Queensland Government requirements to support efficiency and avoid duplication.			This is for information and clarification purposes only.	This is for information and clarification purposes only.			
Criterion 22 - Split	22.1 - The proponent's review of the Protocol must take into account all relevant studies, policies, standards, guidelines and advice relating to CSG activity published or provided to the proponent by the Commonwealth or Queensland governments.	This requirement is noted in Section 9 of the Protocol. The Protocol approved by the Department in 2011 is the current Protocol. No reviews have been required, either by request from the Department or prior to the next stage of development.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Evidence to verify that review processes have been fulfilled taking into account relevant Commonwealth and Queensland government information as required by 22.1.	Evaluation of evidence to determine the requirements of 22.1 are covered.	Not applicable		
Criterion 22 (Split)	22.2 - The proponent's review of the Protocol must take into account all relevant studies, policies, standards, guidelines and advice relating to CSG activity published or provided to the proponent by other proponents undertaking similar activities, or published or provided by other parties, including any findings of an audit against conditions, or plans or other documentation required under the conditions of this approval.	This requirement is noted in Section 9 of the Protocol. The Protocol approved by the Department in 2011 is the current Protocol. No reviews have been required, either by request from the Department or prior to the next stage of development.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Evidence to verify that review process has been fulfilled taking into account relevant information published or provided by other proponents undertaking similar activities or by other parties, or findings of audits against conditions, plans or documents required under the conditions of this approval.	Discussions with relevant personnel, review of correspondence and revised Protocols to ensure information in 22.2 has been taken into account.	Not applicable		
Criterion 23 - split	23.1 The Department may require, by a request in writing, that the Protocol and related plans be revised or amended before approval.	The Protocol was submitted to the Department of Sustainability, Environment, Water, Population and Communities for review as Revision 1 on 5 August 2011. Revision 2 of the Protocol (Final issue) is dated 31 August 2011, and approved by the Minister's delegate on 1 September 2011. Auditors advised that no requests have been made by the Department for the Protocol and related plans to be revised or amended.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011 Letter from James Barker (SEWPaC) to Katherine Jack (Australia Pacific LNG) dated 1 September 2011. Australia Pacific LNG reference Q-LNG01-15-EA-0061	Check if the Department required the Protocol and / or related Plans to be revised or amended before approval.	Verify if requirements of 23.1 have been meet if any request has been made in writing by the Dept.	Not applicable		
Criterion 23 - split	23.2 Any such request must be acted on within the time frame specified.	Auditors advised that no requests have been made by the Department for the Protocol and related plans to be revised or amended.		Check that the Department's request was acted on by the proponent within the time frame specified.	1. Determine if the Department's written request specifies a time frame within which the Protocol or related Plans should be revised and updated. 2. Determine if the proponent complied with the time frames specified where relevant.	Not applicable		

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 24 - split	24.1 The approved Protocol must be incorporated into the proponent's management procedures, operational plans and other relevant documentation and kept current for the life of the project.	Section 9 of the Protocol states that the approved Protocol will be incorporated into management procedures, operational plans and documentation and kept current for the life of the project. The Protocol is an overarching document which is included in infrastructure location decisions. A description of how the Protocol related to the project is provided in the audit report.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check that the approved Protocol has been incorporated into relevant documentation including but not limited to management plans, procedures, operational plans etc. and kept current for the life of the project.	Evaluation of evidence including: • a review of a sample of management procedures, operational plans & other relevant documents to confirm these are in accordance with the approved Protocol; • a review the above documents to ensure that procedures are in place to maintain currency with any relevant updates resulting from changes to the Protocol; and • a review of a sample of operational documents to confirm relevant updates resulting from changes to the protocol.	Compliant		
Criterion 24 - split	24.2 The approved Protocol must be kept current for the life of the project.	Section 9 of the Protocol states that the approved Protocol will be incorporated into management procedures, operational plans and documentation and kept current for the life of the project. The Protocol has not been required to be reviewed under Conditions 20-23. The current version of the Protocol is Revision 2, as approved by the Minister's delegate on 1 September 2011.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011 Letter from James Barker (SEWPaC) to Katherine Jack (Australia Pacific LNG) dated 1 September 2011. Australia Pacific LNG reference Q-LNG01-15-EA-0061	Check that the approved Protocol has been kept current for the life of the project to date.	Check that the Protocol has been reviewed and updated as required by Conditions 20-23.	Compliant		
Criterion 25 split	The maximum disturbance limits in Table 2 (below) apply to authorised unavoidable adverse impacts on MNES within the project area as a result of exploration, development, operation and decommissioning within the project area illustrated in Attachment 1, and external to it, ('whole of project' disturbance limits) and all associated activities.	Disturbance to TECs are recorded as disturbances to MNES. Disturbance to potential habitat for listed fauna is not recorded.	TEC disturbance spreadsheet sighted, including GIS register and related figures.	Check that the disturbance to MNES is within the maximum disturbance limits in Table 2 and Table 3 listed below:	Review of records and clearing data to verify maximum disturbance areas in line with limits detailed in tables 2 and 3 below.	Undetermined	Despite the fact that Origin Energy are in ongoing consultation with the Department regarding 'potential habitat' the fact that disturbance limits are not being recorded constitutes non-compliance.	Disturbance to TECs are recorded as disturbances to MNES. The disturbance at the time of the audit is presented below. Disturbance to potential habitat for listed fauna is not recorded. As per the Department of the Environment's audit criteria and methodolgy, a rating of 'undetermined' has been given as the condition falls inside the
Table 2	**Disturbance limits for listed threatened ecological communities**							
	Ecological community	**EPBC Act status**	**Disturbance limit (ha)**					
	Brigalow *(Acacia harpophylla dominant and co-dominant)*	Endangered	94.61 ha	Check these disturbance limits	Verify disturbance limits.	Compliant	In relation to disturbance limits the Department requires further information/clarification as the audit report must provide commentary on the nature of the records reviewed, that date of interrogation of those records, and details of the actual extent of disturbance to support the findings.	TEC disturbance spreadsheet sighted, including GIS register and related figures. Sighted by auditors 4 February 2015. Actual disturbance at time of audit = 46.4 ha
	Weeping Myall Woodland	Endangered	0 (No disturbance authorised)	Check these disturbance limits	Verify disturbance limits.	Compliant	In relation to disturbance limits the Department requires further information/clarification as the audit report must provide commentary on the nature of the records reviewed, that date of interrogation of those records, and details of the actual extent of disturbance to support the findings.	TEC disturbance spreadsheet sighted, including GIS register and related figures. Sighted by auditors 4 February 2015. Actual disturbance at time of audit = 0 ha
	The community of native species dependent on natural discharge of groundwater from the Great Artesian Basin	Endangered	0 (No disturbance authorised)	Check these disturbance limits	Verify disturbance limits.	Compliant	In relation to disturbance limits the Department requires further information/clarification as the audit report must provide commentary on the nature of the records reviewed, that date of interrogation of those records, and details of the actual extent of disturbance to support the findings.	TEC disturbance spreadsheet sighted, including GIS register and related figures. Sighted by auditors 4 February 2015. Actual disturbance at time of audit = 0 ha
	Semi-evergreen vine thickets of the Brigalow Belt (North and South) and Nandewar Bioregions	Endangered	4.91 ha	Check these disturbance limits	Verify disturbance limits.	Compliant	In relation to disturbance limits the Department requires further information/clarification as the audit report must provide commentary on the nature of the records reviewed, that date of interrogation of those records, and details of the actual extent of disturbance to support the findings.	TEC disturbance spreadsheet sighted, including GIS register and related figures. Sighted by auditors 4 February 2015. Actual disturbance at time of audit = 1.2 ha
	Natural Grasslands of the Queensland Central Highlands and the northern Fitzroy Basin	Endangered	0 (No disturbance authorised)	Check these disturbance limits	Verify disturbance limits.	Compliant	In relation to disturbance limits the Department requires further information/clarification as the audit report must provide commentary on the nature of the records reviewed, that date of interrogation of those records, and details of the actual extent of disturbance to support the findings.	TEC disturbance spreadsheet sighted, including GIS register and related figures. Sighted by auditors 4 February 2015. Actual disturbance at time of audit = 0 ha
	Note: Table 2 is derived from the Australia Pacific LNG Environmental Offset Strategy of 16 November 2010; Volume 2: Gas Fields, Chapter 23: Matters of National Environmental Significance including Section 23.4 EPBC Act significant impact criteria assessment of the APLNG EIS of March 2010; and from listed ecological community profiles available on the Department's website.			This is for information only.	This is for information only.			
Table 3	**Disturbance limits for listed species**	**EPBC Act status**	**Disturbance limit (ha)**	**Indicative habitat**	**Requirement**	**Verification Method**		
	Egernia rugosa (Yakka Skink)	Vulnerable	73.44* ha of potential habitat	Open dry sclerophyll forest or woodland, Brigalow, shrublands, lancewood forests on sandy and open textured soils. Dense ground cover, cavities in soil-bound root systems of fallen trees and beneath rocks, hollow logs and animal burrows are considered to provide suitable microhabitat for this species.	Verify disturbance limits.	Undetermined	Despite the fact that Origin Energy are in ongoing consultation with the Department regarding 'potential habitat' the fact that disturbance limits are not being recorded constitutes non-compliance.	Disturbance to potential habitat for listed fauna is not recorded. As per the Department of the Environment's audit criteria and methodolgy, a rating of 'undetermined' has been given as the condition falls inside the scope of the audit, but there is insufficient evidence to make a judgement on compliance or non-compliance.

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
	Furina dunmalli (Dunmall's Snake)	Vulnerable	262.49* ha of potential habitat	Brigalow (Acacia harpophylla) forest and woodland growing on cracking black clay and clay loam soils (usually on heavy clay soils). Also known to occur in eucalypt and callitris woodland with fallen timber and ground litter.	Verify disturbance limits.	Undetermined	Despite the fact that Origin Energy are in ongoing consultation with the Department regarding 'potential habitat' the fact that disturbance limits are not being recorded constitutes non-compliance.	Disturbance to potential habitat for listed fauna is not recorded. As per the Department of the Environment's audit criteria and methodolgy, a rating of 'undetermined' has been given as the condition falls inside the scope of the audit, but there is insufficient evidence to make a judgement on compliance or non-compliance.
Note	* Disturbance limits for Yakka Skink and Dunmall's Snake potential habitat are derived as per the fauna habitat reduction methodology applied in Australia Pacific LNG - Fauna habitat Calculations for the Gas Fields Q-LNG01-15-RP-0014 of 16 November 2010.			This is for information purposes only	This is for information purposes only.			
Note 1	Note 1: Table 3 is derived from Volume 2: Gas Fields, Chapter 23: Matters of National Environmental Significance including Section 23.4 EPBC Act significant impact criteria assessment of the APLNG EIS of March 2010; Australia Pacific LNG - Fauna habitat Calculations for the Gas Fields Q-LNG01-15-RP-0014 of 16 November 2010; and from listed threatened species profiles available on the Department's website.							
Note 2	Note 2: Habitat for species in Table 3 will be described in the management plan for each species as required under condition 8. The habitat described in Table 3 is indicative only.	Section 9.9 of the Threatened Fauna Management Plan describes habitat for the Yakka Skink. Section 9.11 of the TFMP describes habitat for Dunmall's snake.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	Habitat for species in Table 3 to be described in the management plan as required by condition 8.	Verify information required by Note 2 has been included in plans as required by condition 8.	Compliant		
Criterion 26	Impact on Narran lakes - The Gasfield activities must not have a significant impact on the Narran Lakes Wetlands.	Section 6.2 of the CWMMP states that "concluded that it would be unlikely for treated CSG water to be transmitted to an extent that it could affect Narran Lakes. This was further confirmed with additional modelling completed by RPS in 2012. Appendix C - RPS (ex Conics) Assessment of Impact on Narran Lakes Wetland. Since there is no potential to impact on MNES associated with Narran Lakes, it is not considered necessary to develop threshold values." A letter from RPS to Origin Energy states that "there is likely to be minimal (if any) flow of CSG water from the APLNG project (and hence no impact) into Narran Lakes and certainly not Gwydir Wetlands."	Australia Pacific LNG Upstream Phase 1 Stage 2 Coal Seam Gas Water Monitoring and Management Plan: Surface Water Monitoring and Management Q-LNG01-95-MP-1040, Revision 6, 12 March 2014). Letter from David Carberry (RPS) to Robert Kane (Origin Energy), dated 9 June 2010, subject Proposed APLNG Discharge and Impact on Narran Lakes and Gwydir Wetlands	Identify potential impacts to the area and management plan mitigation measures.	1. Obtain & review evidence of any Management plan and site specific monitoring carried out; and 2. review of OSIS records	Compliant	The Department requires further information/clarification as to commitments were actually measured from an implementation perspective to demonstrate compliance? Was a site inspection conducted to establish that gas field activities have not had a significant impact on the Narran Lakes Wetlands?	Section 6.2 of the CWMMP states that "concluded that it would be unlikely for treated CSG water to be transmitted to an extent that it could affect Narran Lakes. This was further confirmed with additional modelling completed by RPS in 2012. Appendix C - RPS (ex Conics) Assessment of Impact on Narran Lakes Wetland. Since there is no potential to impact on MNES associated with Narran Lakes, it is not considered necessary to develop threshold values." A letter from RPS to Origin Energy states that "there is likely to be minimal (if any) flow of CSG water from the APLNG project (and hence no impact) into Narran Lakes and certainly not Gwydir Wetlands." No site inspection of Narran Lakes was conducted. The RPS report provided as part of the CWWMP states that there is "no potential to impact on MNES associated with Narran Lakes". A letter was provided by RPS to Australia Pacific LNG to further substantiate this. It is considered that this is sufficient evidence that no significant impact is occuring.

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
EPBC Approval Condition 5	Protocol imposed constraints and assessment requirements -							
Criterion 5	5. The Protocol must:							
Criterion 5a	a. classify the following as being within the proponent's sensitivity categories 1 to 4 (or should the proponent's classification be revised, equivalent high environmental constraints class): Note: The commitments or undertakings that require implementing are to be separately identified and measured in this checklist.			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.			
Criterion 5a.i)	i. all listed threatened ecological communities;			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.			
Criterion 5a.ii)	ii. all listed flora species; and			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.			
Criterion 5a.iii)	iii. those listed threatened and migratory fauna species habitats as identified in management plans required under these conditions, which where relevant may be described in terms of specific niche habitat types;			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.			
Criterion 5b	b. include constraints mapping for sensitivity category 1-7 as described in the proponent's Environmental Impact Statement;			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.			
Criterion 5c	c. require pre-clearance site assessments of sensitivity category 1-4 by an approved suitably qualified ecologist;	Four preclearance surveys were sighted: -Griffin BC pressure zones 1A-3 (New Ground) -Potters Flat (Boobook) -Crosby Property (New Ground) -Keys Property (AMEC) It is not clear from these pre-clearance surveys whether the sites are located in sensitivity categories 1-4. It was unclear if Ausecology, or their ecologists are approved. It is also unclear if Griffin BC pressure zones 1A-3 include sensitivity categories 1-4, and therefore many not require an approved ecologist. Boobook received company approval to undertake pre-clearance surveys on 28 June 2011. The Crosby property survey does not state specific ecologists. Noted that approval for nine New Ground ecologists has been sighted from 18 February 2013. This approval is dated after submission of the survey report as Revision 0 on 12 February 2013. Dan Rollison signed off the report and has previously been approved by the Department on 11 May 2011. An ecology assessment report refers to New Ground approved to undertake ecological surveys by DSEWPaC on the 28/06/2011, however evidence of this approval was not provided during the audit. AMEC ecologists, James Gubby and Trevor Meers, approved for terrestrial flora and terrestrial fauna respecitively, on 31 July 2012.	Australia Pacific LNG preclearance ecological assessment: Griffin BC pressure zone 1A-3, New Ground on: Lot 3 on Plan AB195, Q-4500-15-RP-1005 Rev 0, 30/1/13 Lot 6 on plan AB78, Q-4200-15-RP-1049, Rev 0, 30/10/12 Lot 4 on plan AB78, Q-4200-15-RP-1071, Rev 0, 30/1/13. Pre-clearance survey report: R. Golden 'Potters Flat', Lot 21 on Plan AB47, Lot 22 on Plan AB47 and Lot 24 on Plan AB142, Combabula Tenement. Boobook, Revision 0, 23 January 2014 Preclearance Survey of: Lot 7 on plan RG18, Lot 19 on plan RG189, Lot 20 on plan RG18, and Lot 38 on plan RG68, AMEC, Revision 0, February 2013 Pre-clearing Survey in Relation to Lot 18 SP133341 (Crosby Property), New Ground, 12 February 2013 Letter from James Barker to Katherine Jack, Company approval of ecologists: EPBC2009/4974, EPBC 2009/4976 and EPBC 2009/4977, dated 28 June 2011 Letter from Shane Gaddes to Rob Ully, Approval of suitably qualified ecologists under the EPBC Act approvals 2007/4974, 2008/4976 and 2008/4977. Dated 10 December 2012. Letter from Shane Gaddes to Rob Ully, Approval of suitably qualified ecologists under the EPBC Act approvals 2007/4974, 2008/4976 and 2008/4977. Dated 18 February 2013. Letter from Shane Gaddes to Rob Ully, Approval of suitably qualified ecologists under the EPBC Act approvals 2007/4974, 2008/4976 and 2008/4977. Dated 13 September 2013. Letter from Shane Gaddes to Rob Ully, Approval of suitably qualified ecologists under the EPBC Act approvals 2007/4974, 2008/4976 and 2008/4977. Dated 18 February 2013. Letter from James Barker to Katherine Jack, dated 11 May 2011	Evidence to verify this element has been implemented.	Review of assessment reports to ensure they have taken this into account.	Compliant	The Department requires further information/clarification as a representative sample of site assessments for sensitivity category 1 - 4 should have been identified and selected for review.	Four preclearance surveys were sampled and sighted: -Griffin BC pressure zones 1A-3 (New Ground) -Potters Flat (Boobook) -Crosby Property (New Ground) -Keys Property (AMEC) It was not clear from these pre-clearance surveys whether the sites are located in sensitivity categories 1-4 which makes identification of a representative sample difficult. The sample size was determined in line with the approach to identification of locations for the site visit. As approved ecologists were used in all cases that were audited, this improved the auditors confidence that this condition was complied with. Griffin BC: New Ground received company approval to undertake pre-clearance surveys on 28 June 2011 Potters Flat: Boobook received company approval to undertake pre-clearance surveys on 28 June 2011. Approval for Crosby Property New Ground ecologists sighted in 2 letters from the Department (10 December 2012 and 18 February 2013) Keys Property: AMEC ecologists, James Gubby and Trevor Meers, approved for terrestrial flora and terrestrial fauna respecitively, on 31 July 2012.

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 5d	d. require pre-clearance site assessments of sensitivity category 5-7 by a suitably qualified environmental officer;		Australia Pacific LNG preclearance ecological assessment: Griffin BC pressure zone 1A-3, New Ground on: Lot 3 on Plan AB195, Q-4500-15-RP-1005 Rev 0, 30/1/13 Lot 6 on plan AB78, Q-4200-15-RP-1049, Rev 0, 30/10/12 Lot 4 on plan AB78, Q-4200-15-RP-1071, Rev 0, 30/1/13. Pre-clearance survey report: R. Golden 'Potters Flat', Lot 21 on Plan AB47, Lot 22 on Plan AB47 and Lot 24 on Plan AB142, Combabula Tenement. Boobook, Revision 0, 23 January 2014 Preclearance Survey of: Lot 7 on plan RG18, Lot 19 on plan RG189, Lot 20 on plan RG18, and Lot 38 on plan RG68, AMEC, Revision 0, February 2013 Pre-clearing Survey in Relation to Lot 18 SP133341 (Crosby Property), New Ground, 12 February 2013 Letter from James Barker to Katherine Jack, Company approval of ecologists: EPBC2009/4974, EPBC 2009/4976 and EPBC 2009/4977, dated 28 June 2011 Letter from Shane Gaddes to Rob Ully, Approval of suitably qualified ecologists under the EPBC Act approvals 2007/4974, 2008/4976 and 2008/4977. Dated 10 December 2012. Letter from Shane Gaddes to Rob Ully, Approval of suitably qualified ecologists under the EPBC Act approvals 2007/4974, 2008/4976 and 2008/4977. Dated 18 February 2013. Letter from Shane Gaddes to Rob Ully, Approval of suitably qualified ecologists under the EPBC Act approvals 2007/4974, 2008/4976 and 2008/4977. Dated 13 September 2013. Letter from Shane Gaddes to Rob Ully, Approval of suitably qualified ecologists under the EPBC Act approvals 2007/4974, 2008/4976 and 2008/4977. Dated 18 February 2013. Letter from James Barker to Katherine Jack, dated 11 May 2011	Evidence to verify this element has been implemented.	Review of assessment reports to ensure they have taken this into account.	Compliant	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. A representative sample of site assessments for sensitivity category 5 - 7 should have been identified and selected for review.	Four preclearance surveys were sighted: -Griffin BC pressure zones 1A-3 (New Ground) -Potters Flat (Boobook) -Crosby Property (New Ground) -Keys Property (AMEC) In all cases, approved ecologists were used to carry out the pre-clearance assessments (see response to condisiton 5c) and are therefore considerd to be suitable qualified.
Criterion 5e	e. for any MNES identified following an assessment under 5d, require review of those pre-clearance site assessments by a suitably qualified ecologist;			Evidence to verify this element has been implemented.	Review of assessment reports to ensure they have taken this into account.	Undetermined	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. A representative sample of site assessments for sensitivity category 5 - 7 should have been identified and selected for review to determine if any MNES were identified that then required the pre-clearance sites assessments to be reviewed by a qualified ecologist.	Due to the diffence in land classification between the EIS (BAAM mapping) and the land classification approach taken in the ECA process, it is difficult to align specific categories from the EPBC approval with those found during the preclearance process. However, following the assessment carried out under condition 5d, no evidence was sighted during the audit to determine if any MNES were identified that then required review of the pre-clearance site assessments. All preclearance assessments sighted were carried out by approved ecologists and considered to be suitably qualified.
Criterion 5f	f. update constraints mapping with results of any pre-clearance site assessments which confirm presence of MNES	Following discussion with Australia Pacific LNG and review of pre-clearance assessment methodology, the auditors understand that results of pre-clearance site assessments (including GIS data recorded using a trimble in the field) is provided to update constraints mapping prior to design finalisation. See audit report for detail on this process.	Australia Pacific LNG preclearance ecological assessment: Griffin BC pressure zone 1A-3, Ausecology, Revision 0, November 2013 Pre-clearance survey report: R. Golden 'Potters Flat', Lot 21 on Plan AB47, Lot 22 on Plan AB47 and Lot 24 on Plan AB142, Combabula Tenement. Boobook, Revision 0, 23 January 2014 Preclearance Survey of: Lot 7 on plan RG18, Lot 19 on plan RG189, Lot 20 on plan RG18, and Lot 38 on plan RG68, AMEC, Revision 0, February 2013 Pre-clearing Survey in Relation to Lot 18 SP133341 (Crosby Property), New Ground, 12 February 2013 Australia Pacific LNG Gathering - Combabula - Golden, R Environmental Constraints Assessment, Q-4200-15-RP-1156, Revision 0, 16 September 2013 Combabula - Gas Processing Facility Environmental Constraints Assessment, Q-4200-15-RP-0001, Revision: 0, 9 July 2013 Australia Pacific LNG Gathering - Combabula, Griffin BC Zone 1A-2 Environmental Constraints Assessment, Q-4200-15-RP-1092, Revision: 0, 9 May 2013 Australia Pacific LNG Gathering - Combabula, Griffin BC Zone 0A-4 Environmental Constraints Assessment, Q-4200-15-RP-1093, Revision: 0, 7 March 2013	Evidence to verify this element has been implemented.	Review of constraints mapping and site inspection to ensure they have taken this into account.	Compliant	The Department requires further information/clarification as to what actual documentation was reviewed to confirm that the requirement to: 'update constraints mapping with the results of any pre-clearance site assessments which confirm the presence on MNES' was implemented.	Following discussion with Australia Pacific LNG and review of pre-clearance assessment methodology, the auditors understand that results of pre-clearance site assessments (including GIS data recorded using a trimble in the field) is provided to update constraints mapping prior to design finalisation. See audit report for detail on this process. During the audit, documentation, inlcuding pre-clearance surveys, ecology assessments and environmental constraints assessments, was reviewed. Each document referenced the previous assessment as a source, indicating that new information is used to update existing constraints mapping.
Criterion 5g	g. require the documentation of all planning decisions and pre-clearance site assessments and field ecological surveys in proposed gas fields development areas where sensitivity category 1-4 is mapped, likely or found;	Planning decisions for infrastructure placement are recorded in Environmental Constraints Assessments (ECAs). ECAs for the following locations were sighted: -Gathering - Combabula, Golden, R -Gathering - Combabula, Griffin BC Zone 1A-2 -Gathering - Combabula, Griffin BC Zone 0A-4 -Gas Processing Facility - Combabula Pre-clearance assessments are documented separately, with the results used in planning decisions.	Australia Pacific LNG Gathering - Combabula - Golden, R Environmental Constraints Assessment, Q-4200-15-RP-1156, Revision 0, 16 September 2013 Combabula - Gas Processing Facility Environmental Constraints Assessment, Q-4200-15-RP-0001, Revision: 0, 9 July 2013 Australia Pacific LNG Gathering - Combabula, Griffin BC Zone 1A-2 Environmental Constraints Assessment, Q-4200-15-RP-1092, Revision: 0, 9 May 2013 Australia Pacific LNG Gathering - Combabula, Griffin BC Zone 0A-4 Environmental Constraints Assessment, Q-4200-15-RP-1093, Revision: 0, 7 March 2013	Evidence to verify this element has been implemented.	Review of documentation to ensure requirements of g are included.	Compliant	The Department requires further information/clarification to confirm that the Environmental Constraints Assessments that were reviewed were in relation to sensitivity category 1 -4.	Planning decisions for infrastructure placement are recorded in Environmental Constraints Assessments (ECAs). Each ECA lists the sensitivity categories identified on site. ECAs for the following locations were sighted: -Gathering - Combabula, Golden, R (this contains sensitivity categories 1 and 4) -Gathering - Combabula, Griffin BC Zone 1A-2 (this contains sensitivity categories 1-4) -Gathering - Combabula, Griffin BC Zone 0A-4 -Gas Processing Facility - Combabula Pre-clearance assessments are documented separately, with the results used in planning decisions.
Criterion 5h	h. implement species management plans (as required in condition 7);			Refer Species Management Plan checklist.	Refer Species Management Plan checklist.			
Criterion 5i	i. calculate disturbance as required in condition 13;	Refer to condition 13 for compliance assessment		Evidence to verify this element has been implemented.	Check disturbance limits as per Condition 25	Not compliant	This item should be assigned non-compliance - as identified under Condition 13.	By virtue of non-compliance with some sub-conditions of Condition 13, the requirements of this condition are not considered to be met.

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 5j	j. take into account all current survey data and available information and maps of all MNES relevant to the project area as described within environmental sensitivity category 1-4; and	The environmental workpacks contain recent mapping, updated from groundtruthing surveys. These mapping suites contain current survey data and sensitivity categories.	Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014 Combabula Gathering System – Golden RG – Field Services Group (FSG), Drilling and Completions Environmental Workpack, Q-4200-15-WP-1044 Revision: 0, 16 April 2014 Combabula Gathering System – Golden & Wathen Zones 2A – Field Services Group (FSG) and Drilling Environmental Workpack, Q-4200-15-WP-1019 Revision: 0, 12 December 2012 Combabula Gathering System, Griffin BC, Pressure Zones 0A-4 & 1A-2 Environmental Workpack, Q-4200-15-WP-1027 Revision: 0, 31 May 2013 Reedy Creek Water Treatment Facility (WTF) - Lots 72WV619, 29WV630, 30WV630 and 34WV774 Environmental Workpack, Q-4240-15-WP-0001 Revision: 2, 21 November 2012 Reedy Creek Gas Processing Facility (GPF) Construction Environmental Workpack, Q-4231-15-WP-0001 Revision: 1, 16 November 2012 Combabula – Gas Processing Facility Earthworks, Road Works and Drainage Environmental Workpack, Q-4200-15-WP-1005 Revision: 2, 28 January 2014	Evidence to verify this element has been implemented.	Review of all current survey data and available information & maps of all MNES relevant to the project area to ensure they have taken this into account.	Compliant		
Criterion 5k	k. require the pre-clearance site assessments and field ecological surveys to identify and assess options relating to development impacts on MNES and provide recommendations to inform the development of the project area;	Pre-clearance surveys sighted each include a recommendations sections with relation to MNES flora and fauna management.	Australia Pacific LNG preclearance ecological assessment: Griffin BC pressure zone 1A-3, Ausecology, Revision 0, November 2013 Pre-clearance survey report: R. Golden 'Potters Flat', Lot 21 on Plan AB47, Lot 22 on Plan AB47 and Lot 24 on Plan AB142, Combabula Tenement. Boobook, Revision 0, 23 January 2014 Preclearance Survey of: Lot 7 on plan RG18, Lot 19 on plan RG189, Lot 20 on plan RG18, and Lot 38 on plan RG68, AMEC, Revision 0, February 2013 Pre-clearing Survey in Relation to Lot 18 SP133341 (Crosby Property), New Ground, 12 February 2013	Evidence to verify this element has been implemented.	Review of pre-clearance site assessment reports and field ecological surveys to ensure they have taken this into account.	Compliant	The Department requires further information/clarification to confirm that the pre-clearance site assessments are used to: 'identify and assess options relating to development impacts on MNES provide recommendations to inform the development of the project area'.	Pre-clearance surveys sighted each include a recommendations sections with relation to MNES flora and fauna management. The results of pre-clearance surveys are included in constraints mapping as per condition 5f, to inform development decisions.
Note	Note: The proponent's approach to sensitivity mapping relates to impact avoidance and mitigation as described in volume 2, chapter 23 of the proponent's Environmental Impact Statement (publicly released 20 march 2010). The indicative sensitivity categories described in the EIS are:			See below	See below			
	Category 1: Extremely sensitive: Siting of infrastructure within these areas will be avoided.	BAAM sensitivity category mapping used in the EIS is ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase).	Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014 Combabula Gathering System – Golden RG – Field Services Group (FSG), Drilling and Completions Environmental Workpack, Q-4200-15-WP-1044 Revision: 0, 16 April 2014 Combabula Gathering System – Golden & Wathen Zones 2A – Field Services Group (FSG) and Drilling Environmental Workpack, Q-4200-15-WP-1019 Revision: 0, 12 December 2012 Combabula Gathering System, Griffin BC, Pressure Zones 0A-4 & 1A-2 Environmental Workpack, Q-4200-15-WP-1027 Revision: 0, 31 May 2013 Reedy Creek Water Treatment Facility (WTF) - Lots 72WV619, 29WV630, 30WV630 and 34WV774 Environmental Workpack, Q-4240-15-WP-0001 Revision: 2, 21 November 2012 Reedy Creek Gas Processing Facility (GPF) Construction Environmental Workpack, Q-4231-15-WP-0001 Revision: 1, 16 November 2012 Combabula – Gas Processing Facility Earthworks, Road Works and Drainage Environmental Workpack, Q-4200-15-WP-1005 Revision: 2, 28 January 2014	Evidence to verify this element has been implemented.	Review of reports & Site inspection.	Compliant	The Department requires further information/clarification as the audit comments do not specifically address the requirement of: 'Siting of infrastructure within these areas will be avoided.' Based on the audit comments Categories 2, 3, 6 and 7 were not measured and at best should result in some undetermined findings.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No infrastructure (wells, linear or non-linear) was identified in category 1 during the audit, through either documentation review or site inspection.
	Category 2: Highly Sensitive: Infrastructure will only be located within or in proximity to existing cleared and disturbed areas to reduce fragmentation; Limited clearing (if necessary for incremental expansion of existing disturbance) for construction to be rehabilitated prior to operation.		Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014 Combabula Gathering System – Golden RG – Field Services Group (FSG), Drilling and Completions Environmental Workpack, Q-4200-15-WP-1044 Revision: 0, 16 April 2014 Combabula Gathering System – Golden & Wathen Zones 2A – Field Services Group (FSG) and Drilling Environmental Workpack, Q-4200-15-WP-1019 Revision: 0, 12 December 2012 Combabula Gathering System, Griffin BC, Pressure Zones 0A-4 & 1A-2 Environmental Workpack, Q-4200-15-WP-1027 Revision: 0, 31 May 2013 Reedy Creek Water Treatment Facility (WTF) - Lots 72WV619, 29WV630, 30WV630 and 34WV774 Environmental Workpack, Q-4240-15-WP-0001 Revision: 2, 21 November 2012 Reedy Creek Gas Processing Facility (GPF) Construction Environmental Workpack, Q-4231-15-WP-0001 Revision: 1, 16 November 2012 Combabula – Gas Processing Facility Earthworks, Road Works and Drainage Environmental Workpack, Q-4200-15-WP-1005 Revision: 2, 28 January 2014	Evidence to verify this element has been implemented.	Review of reports & Site inspection.	Compliant	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: ' Infrastructure will only be located within or in proximity to existing cleared and disturbed areas to reduce fragmentation; Limited clearing (if necessary for incremental expansion of existing disturbance) for construction to be rehabilitated prior to operation'. Based on the audit comments Categories 2, 3, 6 and 7 were not measured and at best should result in some undetermined findings.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No infrastructure (wells, linear or non-linear) was identified in category 2 during the audit, through either documentation review or site inspection.

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
	Category 3: Sensitive: Clearing only for linear infrastructure and well leases. Non-linear infrastructure to be located within or in proximity to existing cleared and disturbed areas. Disturbed areas not required for ongoing operation to be rehabilitated prior to operation.		Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014 Combabula Gathering System – Golden RG – Field Services Group (FSG), Drilling and Completions Environmental Workpack, Q-4200-15-WP-1044 Revision: 0, 16 April 2014 Combabula Gathering System – Golden & Wathen Zones 2A – Field Services Group (FSG) and Drilling Environmental Workpack, Q-4200-15-WP-1019 Revision: 0, 12 December 2012 Combabula Gathering System, Griffin BC, Pressure Zones 0A-4 & 1A-2 Environmental Workpack, Q-4200-15-WP-1027 Revision: 0, 31 May 2013 Reedy Creek Water Treatment Facility (WTF) - Lots 72WV619, 29WV630, 30WV630 and 34WV774 Environmental Workpack, Q-4240-15-WP-0001 Revision: 2, 21 November 2012 Reedy Creek Gas Processing Facility (GPF) Construction Environmental Workpack, Q-4231-15-WP-0001 Revision: 1, 16 November 2012 Combabula – Gas Processing Facility Earthworks, Road Works and Drainage Environmental Workpack, Q-4200-15-WP-1005 Revision: 2, 28 January 2014	Evidence to verify this element has been implemented.	Review of reports & Site inspection.	Compliant	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'Clearing only for linear infrastructure and well leases. Non-linear infrastructure to be located within or in proximity to existing cleared and disturbed areas. Disturbed areas not required for ongoing operation to be rehabilitated prior to operation.' Based on the audit comments Categories 2, 3, 6 and 7 were not measured and at best should result in some undetermined findings.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No infrastructure (linear or non-linear) was identified in category 3 during the audit, through either documentation review or site inspection. BAAM mapping for the 2A work pack indicates wells sited category 3. During the site audit, well CMN280 (MD, HD Golden and ML Wathen) was identified in sensitivity category 3. Justification (squad check) for placement of this well within category 3 sighted by auditors (required due to large spacing, with well placed at best point for least impact construction).
	Category 4: Neutral: Clearing for linear and non-linear infrastructure is to minimise edge effects where possible.		Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014 Combabula Gathering System – Golden RG – Field Services Group (FSG), Drilling and Completions Environmental Workpack, Q-4200-15-WP-1044 Revision: 0, 16 April 2014 Combabula Gathering System – Golden & Wathen Zones 2A – Field Services Group (FSG) and Drilling Environmental Workpack, Q-4200-15-WP-1019 Revision: 0, 12 December 2012 Combabula Gathering System, Griffin BC, Pressure Zones 0A-4 & 1A-2 Environmental Workpack, Q-4200-15-WP-1027 Revision: 0, 31 May 2013 Reedy Creek Water Treatment Facility (WTF) - Lots 72WV619, 29WV630, 30WV630 and 34WV774 Environmental Workpack, Q-4240-15-WP-0001 Revision: 2, 21 November 2012 Reedy Creek Gas Processing Facility (GPF) Construction Environmental Workpack, Q-4231-15-WP-0001 Revision: 1, 16 November 2012 Combabula – Gas Processing Facility Earthworks, Road Works and Drainage Environmental Workpack, Q-4200-15-WP-1005 Revision: 2, 28 January 2014	Evidence to verify this element has been implemented.	Review of reports & Site inspection.	Compliant	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'Clearing for linear and non-linear infrastructure is to minimise edge effects where possible'. Based on the audit comments Categories 2, 3, 6 and 7 were not measured and at best should result in some undetermined findings.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No non-linear infrastructure was identified in category 2-4 during the audit, through either document review or site inspection. The site visit conducted identified linear infrastructure (gathering network) within sensitivity category 4 and 5 (RG Golden, Sustain Phase). Edge effects were not assessed during the audit.
	Category 5: Robust: Clearing for infrastructure, although hollow-bearing trees and habitat connectivity, particularly along watercourses, to be retained.		Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014 Combabula Gathering System – Golden RG – Field Services Group (FSG), Drilling and Completions Environmental Workpack, Q-4200-15-WP-1044 Revision: 0, 16 April 2014 Combabula Gathering System – Golden & Wathen Zones 2A – Field Services Group (FSG) and Drilling Environmental Workpack, Q-4200-15-WP-1019 Revision: 0, 12 December 2012 Combabula Gathering System, Griffin BC, Pressure Zones 0A-4 & 1A-2 Environmental Workpack, Q-4200-15-WP-1027 Revision: 0, 31 May 2013 Reedy Creek Water Treatment Facility (WTF) - Lots 72WV619, 29WV630, 30WV630 and 34WV774 Environmental Workpack, Q-4240-15-WP-0001 Revision: 2, 21 November 2012 Reedy Creek Gas Processing Facility (GPF) Construction Environmental Workpack, Q-4231-15-WP-0001 Revision: 1, 16 November 2012 Combabula – Gas Processing Facility Earthworks, Road Works and Drainage Environmental Workpack, Q-4200-15-WP-1005 Revision: 2, 28 January 2014	Evidence to verify this element has been implemented.	Review of reports & Site inspection.	Compliant	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'Cleared: Siting of infrastructure >100m from edges of categories 2-5 and >200m from category 1'. Based on the audit comments Categories 2, 3, 6 and 7 were not measured and at best should result in some undetermined findings.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. BAAM mapping for the 2A work pack indicates wells sited in the buffer around category 1, and within categories 3 and 5. BAAM mapping for the Griffin BC work pack indicates wells sited in in category 5 only. BAAM mapping for the RG Golden work pack indicates wells sited in the buffer around categories 2 to 5, and within category 5. During the site audit, well CMN237 was identified within the Category 2-5 buffer. The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase).
	Category 6 and 7: Cleared: Siting of infrastructure >100m from edges of categories 2-5 and >200m from category 1.			Evidence to verify this element has been implemented.	Review of reports & Site inspection.	Undetermined	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'Siting of infrastructure >100m from edges of categories 2-5 and >200m from category 1.' Based on the audit comments Categories 2, 3, 6 and 7 were not measured and at best should result in some undetermined findings.	BAAM mapping provided to auditors does not identify categories 6 and 7. Thus no observations were made regarding these categories.

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 5I	I. to avoid direct and indirect adverse impacts on MNES, including fragmentation and edge effects, provide that proposed infrastructure is located in accordance with the following:	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. BAAM mapping for the 2A work pack indicates wells sited in the buffer around category 1. BAAM mapping for the Griffin BC work pack indicates wells sited in in category 5 only. BAAM mapping for the RG Golden work pack indicates wells sited in the buffer around categories 2 to 5, and within category 5.	Combabula Gathering System – Golden RG – Field Services Group (FSG), Drilling and Completions Environmental Workpack, Q-4200-15-WP-1044 Revision: 0, 16 April 2014 Combabula Gathering System – Golden & Wathen Zones 2A – Field Services Group (FSG) and Drilling Environmental Workpack, Q-4200-15-WP-1019 Revision: 0, 12 December 2012 Combabula Gathering System, Griffin BC, Pressure Zones 0A-4 & 1A-2 Environmental Workpack, Q-4200-15-WP-1027 Revision: 0, 31 May 2013	See below	See below	Compliant		
Criterion 5I	When siting exploration and production wells:							
Criterion 5I.i)	i) avoid development within sensitivity category 1 unless authorised in writing by the Department;	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. BAAM mapping for the 2A work pack indicates wells sited in the buffer around category 1. BAAM mapping for the Griffin BC work pack indicates wells sited in in category 5 only. BAAM mapping for the RG Golden work pack indicates wells sited in the buffer around categories 2 to 5, and within category 5.	Combabula Gathering System – Golden RG – Field Services Group (FSG), Drilling and Completions Environmental Workpack, Q-4200-15-WP-1044 Revision: 0, 16 April 2014 Combabula Gathering System – Golden & Wathen Zones 2A – Field Services Group (FSG) and Drilling Environmental Workpack, Q-4200-15-WP-1019 Revision: 0, 12 December 2012 Combabula Gathering System, Griffin BC, Pressure Zones 0A-4 & 1A-2 Environmental Workpack, Q-4200-15-WP-1027 Revision: 0, 31 May 2013	Evidence to verify this element has been implemented.	Undertake review of approval documents and undertake site inspection to confirm implementation.	Compliant	The Department requires further information/clarification as the audit comments do not specifically address the requirement: 'avoid development within sensitivity category 1 unless authorised in writing by the Department'. The verification method also indicates that compliance would be measured through a combination of document review and a site inspection however there is no specific commentary in relation to a site inspection.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No wells were identified within category 1 during the audit through document review or during the site inspection.
Criterion 5I.ii)	ii) avoid development within sensitivity category 2-4, unless the location within any of these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable;	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. BAAM mapping for the 2A work pack indicates wells sited in the buffer around category 1. BAAM mapping for the Griffin BC work pack indicates wells sited in in category 5 only. BAAM mapping for the RG Golden work pack indicates wells sited in the buffer around categories 2 to 5, and within category 5.	Combabula Gathering System – Golden RG – Field Services Group (FSG), Drilling and Completions Environmental Workpack, Q-4200-15-WP-1044 Revision: 0, 16 April 2014 Combabula Gathering System – Golden & Wathen Zones 2A – Field Services Group (FSG) and Drilling Environmental Workpack, Q-4200-15-WP-1019 Revision: 0, 12 December 2012 Combabula Gathering System, Griffin BC, Pressure Zones 0A-4 & 1A-2 Environmental Workpack, Q-4200-15-WP-1027 Revision: 0, 31 May 2013	Evidence to verify this element has been implemented.	Undertake review of approval documents and undertake site inspection to confirm implementation.	Compliant	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement to: 'avoid development within sensitivity category 2-4, unless the location within any of these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable'. The verification method also indicates that compliance would be measured through a combination of document review and a site inspection however there is no specific commentary in relation to a site inspection.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. BAAM mapping for the 2A work pack indicates wells sited in the buffer around category 1, and within categories 3 and 5. During the site audit, well CMN280 (MD, HD Golden and ML Wathen) was identified in sensitivity category 3. Justification (squad check) for placement of this well within category 3 sighted by auditors (required due to large spacing, with well placed at best point for least impact construction).
Criterion 5I.iii)	iii) where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site the wells in proximity to cleared areas, or in areas of lower ecological condition such as previously disturbed or degraded areas; and	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. BAAM mapping for the 2A work pack indicates wells sited in the buffer around category 1. BAAM mapping for the Griffin BC work pack indicates wells sited in in category 5 only. BAAM mapping for the RG Golden work pack indicates wells sited in the buffer around categories 2 to 5, and within category 5.	Combabula Gathering System – Golden RG – Field Services Group (FSG), Drilling and Completions Environmental Workpack, Q-4200-15-WP-1044 Revision: 0, 16 April 2014 Combabula Gathering System – Golden & Wathen Zones 2A – Field Services Group (FSG) and Drilling Environmental Workpack, Q-4200-15-WP-1019 Revision: 0, 12 December 2012 Combabula Gathering System, Griffin BC, Pressure Zones 0A-4 & 1A-2 Environmental Workpack, Q-4200-15-WP-1027 Revision: 0, 31 May 2013	Evidence to verify this element has been implemented.	Undertake review of approval documents and undertake site inspection to confirm implementation	Compliant	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site the wells in proximity to cleared areas, or in areas of lower ecological condition such as previously disturbed or degraded areas'. The verification method also indicates that compliance would be measured through a combination of document review and a site inspection however there is no specific commentary in relation to a site inspection.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. BAAM mapping for the 2A work pack indicates wells sited in the buffer around category 1, and within categories 3 and 5. During the site audit, well CMN280 (MD, HD Golden and ML Wathen) was identified in sensitivity category 3. Justification (squad check) for placement of this well within category 3 sighted by auditors (required due to large spacing, with well placed at best point for least impact construction).
Criterion 5I.iv)	iv) where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. BAAM mapping for the 2A work pack indicates wells sited in the buffer around category 1. BAAM mapping for the Griffin BC work pack indicates wells sited in in category 5 only. BAAM mapping for the RG Golden work pack indicates wells sited in the buffer around categories 2 to 5, and within category 5.	Combabula Gathering System – Golden RG – Field Services Group (FSG), Drilling and Completions Environmental Workpack, Q-4200-15-WP-1044 Revision: 0, 16 April 2014 Combabula Gathering System – Golden & Wathen Zones 2A – Field Services Group (FSG) and Drilling Environmental Workpack, Q-4200-15-WP-1019 Revision: 0, 12 December 2012 Combabula Gathering System, Griffin BC, Pressure Zones 0A-4 & 1A-2 Environmental Workpack, Q-4200-15-WP-1027 Revision: 0, 31 May 2013	Evidence to verify this element has been implemented.	Undertake review of approval documents and undertake site inspection to confirm implementation.	Compliant	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist'. The verification method also indicates that compliance would be measured through a combination of document review and a site inspection however there is no specific commentary in relation to a site inspection.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. BAAM mapping for the 2A work pack indicates wells sited in the buffer around category 1, and within categories 3 and 5. During the site audit, well CMN280 (MD, HD Golden and ML Wathen) was identified in sensitivity category 3. Justification (squad check) for placement of this well within category 3 sighted by auditors (required due to large spacing, with well placed at best point for least impact construction). BAAM mapping for the Griffin BC work pack indicates wells sited in in category 5 only. BAAM mapping for the RG Golden work pack indicates wells sited in the buffer around categories 2 to 5, and within category 5. During the site audit, well CMN237 was identified within the Category 2-5 buffer.
Note	Note: Directional drilling and multiple drill holes from one well pad are options to avoid well site and related infrastructure disturbance to sensitivity category 1-4.			This is not mandatory.	This is not mandatory.			
Criterion 5I	When siting non- linear infrastructure:	BAAM sensitivity category mapping used in the EIS are ground-truthed	Reedy Creek Water Treatment Facility (WTF) - Lots 72WV619, 29WV630, 30WV630 and 34WV774 Environmental			Compliant		

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 5I.i)	i) avoid development within sensitivity category 1 unless authorised in writing by the Department;	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. Work packs reviewed for Combabula GPF, Reedy Creek GPF and Reedy Creek WTF. Combabula GPF located in Category 5, and Category 2-5 buffer. Reedy Creek GPF located primarily in cleared area, with an overlap with Category 2-5 buffer. Reedy Creek WTF located within cleared area and does not overlap with any sensitivity categories.	Reedy Creek Water Treatment Facility (WTF) - Lots 72WV619, 29WV630, 30WV630 and 34WV774 Environmental Workpack, Q-4240-15-WP-0001 Revision: 2, 21 November 2012 Reedy Creek Gas Processing Facility (GPF) Construction Environmental Workpack, Q-4231-15-WP-0001 Revision: 1, 16 November 2012 Combabula – Gas Processing Facility Earthworks, Road Works and Drainage Environmental Workpack, Q-4200-15-WP-1005 Revision: 2, 28 January 2014	Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation.	Compliant	The Department requires further information/clarification as the audit comments do not specifically address the requirement to: 'avoid development within sensitivity category 1 unless authorised in writing by the Department'. Based on the audit comments Category 1 was not measured and at best should result in an undetermined finding. The verification method also indicates that compliance would be measured through a combination of document review and a site inspection however there is no specific commentary in relation to a site inspection.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No non-linear infrastructure was identified in category 1 during the audit, through either document review or site inspection Work packs reviewed for Combabula GPF, Reedy Creek GPF and Reedy Creek WTF. Combabula GPF located in Category 5, and Category 2-5 buffer. Reedy Creek GPF located primarily in cleared area, with an overlap with Category 2-5 buffer. Reedy Creek WTF located within cleared area and does not overlap with any sensitivity categories.
Criterion 5I.ii)	ii) avoid development within sensitivity category 2-4, unless the location within any of these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable;	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. Work packs reviewed for Combabula GPF, Reedy Creek GPF and Reedy Creek WTF. Combabula GPF located in Category 5, and Category 2-5 buffer. Reedy Creek GPF located primarily in cleared area, with an overlap with Category 2-5 buffer. Reedy Creek WTF located within cleared area and does not overlap with any sensitivity categories.	Reedy Creek Water Treatment Facility (WTF) - Lots 72WV619, 29WV630, 30WV630 and 34WV774 Environmental Workpack, Q-4240-15-WP-0001 Revision: 2, 21 November 2012 Reedy Creek Gas Processing Facility (GPF) Construction Environmental Workpack, Q-4231-15-WP-0001 Revision: 1, 16 November 2012 Combabula – Gas Processing Facility Earthworks, Road Works and Drainage Environmental Workpack, Q-4200-15-WP-1005 Revision: 2, 28 January 2014	Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation.	Compliant	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement to: 'avoid development within sensitivity category 2-4, unless the location within any of these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable'. The verification method also indicates that compliance would be measured through a combination of document review and a site inspection however there is no specific commentary in relation to a site inspection.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No non-linear infrastructure was identified in category 2-4 during the audit, through either document review or site inspection Work packs reviewed for Combabula GPF, Reedy Creek GPF and Reedy Creek WTF. Combabula GPF located in Category 5, and Category 2-5 buffer. Reedy Creek GPF located primarily in cleared area, with an overlap with Category 2-5 buffer. Reedy Creek WTF located within cleared area and does not overlap with any sensitivity categories.
Criterion 5I.iii)	iii) where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site infrastructure in or approximate to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas; and	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. Work packs reviewed for Combabula GPF, Reedy Creek GPF and Reedy Creek WTF. Combabula GPF located in Category 5, and Category 2-5 buffer. Reedy Creek GPF located primarily in cleared area, with an overlap with Category 2-5 buffer. Reedy Creek WTF located within cleared area and does not overlap with any sensitivity categories.	Reedy Creek Water Treatment Facility (WTF) - Lots 72WV619, 29WV630, 30WV630 and 34WV774 Environmental Workpack, Q-4240-15-WP-0001 Revision: 2, 21 November 2012 Reedy Creek Gas Processing Facility (GPF) Construction Environmental Workpack, Q-4231-15-WP-0001 Revision: 1, 16 November 2012 Combabula – Gas Processing Facility Earthworks, Road Works and Drainage Environmental Workpack, Q-4200-15-WP-1005 Revision: 2, 28 January 2014	Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation.	Compliant	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site infrastructure in or approximate to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas'. The verification method also indicates that compliance would be measured through a combination of document review and a site inspection however there is no specific commentary in relation to a site inspection.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No non-linear infrastructure was identified in category 2-4 during the audit, through either document review or site inspection Work packs reviewed for Combabula GPF, Reedy Creek GPF and Reedy Creek WTF. Combabula GPF located in Category 5, and Category 2-5 buffer. Reedy Creek GPF located primarily in cleared area, with an overlap with Category 2-5 buffer. Reedy Creek WTF located within cleared area and does not overlap with any sensitivity categories.
Criterion 5I.iv)	iv) where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. Work packs reviewed for Combabula GPF, Reedy Creek GPF and Reedy Creek WTF. Combabula GPF located in Category 5, and Category 2-5 buffer. Reedy Creek GPF located primarily in cleared area, with an overlap with Category 2-5 buffer. Reedy Creek WTF located within cleared area and does not overlap with any sensitivity categories.	Reedy Creek Water Treatment Facility (WTF) - Lots 72WV619, 29WV630, 30WV630 and 34WV774 Environmental Workpack, Q-4240-15-WP-0001 Revision: 2, 21 November 2012 Reedy Creek Gas Processing Facility (GPF) Construction Environmental Workpack, Q-4231-15-WP-0001 Revision: 1, 16 November 2012 Combabula – Gas Processing Facility Earthworks, Road Works and Drainage Environmental Workpack, Q-4200-15-WP-1005 Revision: 2, 28 January 2014	Evidence to verify this element has been implemented.	Complete review of relevant documents and written advice from ecologists and undertake site inspection to confirm implementation.	Compliant	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist'. The verification method also indicates that compliance would be measured through a combination of document review and a site inspection however there is no specific commentary in relation to a site inspection.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No non-linear infrastructure was identified in category 2-4 during the audit, through either document review or site inspection Work packs reviewed for Combabula GPF, Reedy Creek GPF and Reedy Creek WTF. Combabula GPF located in Category 5, and Category 2-5 buffer. Reedy Creek GPF located primarily in cleared area, with an overlap with Category 2-5 buffer. Reedy Creek WTF located within cleared area and does not overlap with any sensitivity categories.
Criterion 5I	When siting linear infrastructure:	BAAM sensitivity category mapping used in the EIS is ground-truthed	Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5			Compliant		
Criterion 5I.i)	i) avoid development within sensitivity category 1 unless authorised in writing by the Department;	BAAM sensitivity category mapping used in the EIS is ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase).	Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014	Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation.	Compliant	The Department requires further information/clarification as the audit comments do not specifically address the requirement to: 'avoid development within sensitivity category 1 unless authorised in writing by the Department'. Based on the audit comments Categories 2 and 3 were not measured and at best should result in some undetermined findings.	BAAM sensitivity category mapping used in the EIS is ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No linear infrastructure was identified in category 1 during the audit, through document review or site inspection The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase).

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 5l.ii)	ii) avoid development within sensitivity category 2-4, unless their location within these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable;	BAAM sensitivity category mapping used in the EIS is ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase).	Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014	Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation.	Compliant	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement to: 'avoid development within sensitivity category 2-4, unless their location within these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable'. Based on the audit comments Categories 2 and 3 were not measured and at best should result in some undetermined findings.	BAAM sensitivity category mapping used in the EIS is ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No linear infrastructure was identified in category 2 or 3 during the audit, through document review or site inspection The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase). Justification for the location of flowline CMN116-1 through sensitivity category 4 is provided in the environmental constraints assessment (The flowline location complies as it is predominantly located within pre-existing disturbed/cleared land.)
Criterion 5l.iii)	iii) where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site infrastructure in or approximate to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas; and	BAAM sensitivity category mapping used in the EIS is ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase).	Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014	Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation.	Compliant	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site infrastructure in or approximate to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas' Based on the audit comments Categories 2 and 3 were not measured and at best should result in some undetermined findings.	BAAM sensitivity category mapping used in the EIS is ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No linear infrastructure was identified in category 2 or 3 during the audit, through document review or site inspection The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase). Justification for the location of flowline CMN116-1 through sensitivity category 4 is provided in the environmental constraints assessment (The flowline location complies as it is predominantly located within pre-existing disturbed/cleared land.)
Criterion 5l.iv)	iv) where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist.	BAAM sensitivity category mapping used in the EIS is ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase).	Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014	Evidence to verify this element has been implemented.	Complete review of relevant documents and written advice from ecologists and undertake site inspection to confirm implementation.	Compliant	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist.' Based on the audit comments Categories 2 and 3 were not measured and at best should result in some undetermined findings.	BAAM sensitivity category mapping used in the EIS is ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No linear infrastructure was identified in category 2 or 3 during the audit, through document review or site inspection The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase). Justification for the location of flowline CMN116-1 through sensitivity category 4 is provided in the environmental constraints assessment (The flowline location complies as it is predominantly located within pre-existing disturbed/cleared land.)
Note	Note: Justification is reportable in accordance with condition 13 a) vii). The management plan requirements under condition 8 h) may also indicate that a species or its habitat can co-exist with specific types of gas field infrastructure and operations.	Justification for TEC clearance sighted by the auditors in squad checks (gated internal constraints approvals) for the following linear infrastructure: -CMN153-1 -CMN170-2 -CMN236-2 -CMN280-1 CMN263-3 -CMN281-3	EPBC squad check justification spreadsheet for TEC disturbance in Combabula pressure zone 2A, Golden RG, Griffin BC, Pressure Zones 0A-4 and 1A-2	Evidence to verify this element has been implemented.	Review records reported in accordance with 13) a).	Compliant	The department considers that as the justification is reportable in accordance with condition 13a) vii this constitutes non-compliance.	This is a note and it is not considered that this requires a compliance evaluation.
Criterion 5m	m. require the proponent to plan for and decide the extent that proposed linear infrastructure may have adverse impacts on MNES in accordance with the following:	Auditors advised that the approved alignment widths are incorporated into design, with the Origin environmental advisor undertaking a final check of alignment widths prior to issue to Principal Contractor. Leighton (Combabula gathering network PC) advised during the site visit that alignment widths are reduced below the approved width where possible, provided that safety on the right of way is not compromised. Alignment sheets were requested during the audit, however were not able to be provided.	Australia Pacific LNG Upstream Sustain, Gathering Construction Package Detailed Design General Requirements Scope of Work, Q-4000-50-SW-0001, Revision 3A 26 November 2014			Compliant		Auditors advised that the approved alignment widths are incorporated into design. The Gathering Construction Package Detailed Design General Requirements Scope of Work document is provided to Origin Contractors with constraints information and a summary of EPBC conditions relating to ROW width. Following design, the Origin environmental advisor undertakes a final check of alignment widths prior to issue to Principal Contractor Leighton (Combabula gathering network PC) advised during the site visit that alignment widths are reduced below the approved width where possible, provided that safety on the right of way is not compromised. Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors.
Criterion 5m.i)	i. all linear disturbance within environmental sensitivity category 1-4 for MNES and the impact risk zone must be:	Auditors advised that the approved alignment widths are incorporated into design, with the Origin environmental advisor undertaking a final check of alignment widths prior to issue to Principal Contractor. Leighton (Combabula gathering network PC) advised during the site visit that alignment widths are reduced below the approved width where possible, provided that safety on the right of way is not compromised. Alignment sheets were requested during the audit, however were not able to be provided.						

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 5m.i)I	I. limited to 12 metres in width for a single flow line;	Auditors advised that the approved alignment widths are incorporated into design, with the Origin environmental advisor undertaking a final check of alignment widths prior to issue to Principal Contractor. Leighton (Combabula gathering network PC) advised during the site visit that alignment widths are reduced below the approved width where possible, provided that safety on the right of way is not compromised. Alignment sheets were requested during the audit, however were not able to be provided.	Gas and Water Gathering System - Potters Flat APLNG Phase 2 Property 21AB47 & 22AB47, Q-4200-95-MT-1002_02, Revision 1, 9/5/14 Gas and Water Gathering System - Nullin (2A) APLNG Sustain Phase Property 23AB47, Q-4200-95-MT-1005_02, Revision 1, 2/5/2015 Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014	Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	Compliant	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit.
Criterion 5m.i)II	II. limited to 18 metres in width for trenches with one water gathering line and one parallel gas gathering line;	Auditors advised that the approved alignment widths are incorporated into design, with the Origin environmental advisor undertaking a final check of alignment widths prior to issue to Principal Contractor. Leighton (Combabula gathering network PC) advised during the site visit that alignment widths are reduced below the approved width where possible, provided that safety on the right of way is not compromised. Alignment sheets were requested during the audit, however were not able to be provided.	Extract from OCIS Compliance Register, most recent entry from February 2014. Gas and Water Gathering System - Potters Flat APLNG Phase 2 Property 21AB47 & 22AB47, Q-4200-95-MT-1002_02, Revision 1, 9/5/14 Gas and Water Gathering System - Nullin (2A) APLNG Sustain Phase Property 23AB47, Q-4200-95-MT-1005_02, Revision 1, 2/5/2015 Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014	Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	Compliant	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit. The following incident was identified in the compliance register: In February 2013 a Contractor was clearing and mulching right of ways for installation of gathering network on the Nullin property. ROW COM284-1 consists of a single water pipeline and gas pipeline and is within the 200m Primary Protection Zone of a Category C Environmentally Sensitive Area (Combabula State Forest). This ROW configuration (single gas and water pipe) is limited to 18m within the PPZ of a Category C ESA. Due to a missing survey peg, ROW COM284-1 was cleared to a width greater than this (approx 25m) and tapered back into 18m over a distance of ~60m.
Criterion 5m.i)III	III. limited to 25 metres in width for multiple trenches where there are three parallel gas or water gathering lines or a single large diameter water pipeline (500mm or above);	Auditors advised that the approved alignment widths are incorporated into design, with the Origin environmental advisor undertaking a final check of alignment widths prior to issue to Principal Contractor. Leighton (Combabula gathering network PC) advised during the site visit that alignment widths are reduced below the approved width where possible, provided that safety on the right of way is not compromised. Alignment sheets were requested during the audit, however were not able to be provided.	Gas and Water Gathering System - Potters Flat APLNG Phase 2 Property 21AB47 & 22AB47, Q-4200-95-MT-1002_02, Revision 1, 9/5/14 Gas and Water Gathering System - Nullin (2A) APLNG Sustain Phase Property 23AB47, Q-4200-95-MT-1005_02, Revision 1, 2/5/2015 Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014	Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	Compliant	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit.
Criterion 5m.i)IV	IV. limited to 30 metres for high pressure gas pipeline less than 750mm diameter;	Auditors advised that the approved alignment widths are incorporated into design, with the Origin environmental advisor undertaking a final check of alignment widths prior to issue to Principal Contractor. Leighton (Combabula gathering network PC) advised during the site visit that alignment widths are reduced below the approved width where possible, provided that safety on the right of way is not compromised. Alignment sheets were requested during the audit, however were not able to be provided.	Gas and Water Gathering System - Potters Flat APLNG Phase 2 Property 21AB47 & 22AB47, Q-4200-95-MT-1002_02, Revision 1, 9/5/14 Gas and Water Gathering System - Nullin (2A) APLNG Sustain Phase Property 23AB47, Q-4200-95-MT-1005_02, Revision 1, 2/5/2015 Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014	Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	Compliant	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit.
Criterion 5m.i)V	V. limited to 40 metres for high pressure gas pipeline equal to or greater than 750mm diameter;	Auditors advised that the approved alignment widths are incorporated into design, with the Origin environmental advisor undertaking a final check of alignment widths prior to issue to Principal Contractor. Leighton (Combabula gathering network PC) advised during the site visit that alignment widths are reduced below the approved width where possible, provided that safety on the right of way is not compromised. Alignment sheets were requested during the audit, however were not able to be provided.	Gas and Water Gathering System - Potters Flat APLNG Phase 2 Property 21AB47 & 22AB47, Q-4200-95-MT-1002_02, Revision 1, 9/5/14 Gas and Water Gathering System - Nullin (2A) APLNG Sustain Phase Property 23AB47, Q-4200-95-MT-1005_02, Revision 1, 2/5/2015 Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014	Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	Compliant	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit.
Criterion 5m.i)VI	VI. limited to an additional 7 metres for each additional trench for water or gas lines.	Auditors advised that the approved alignment widths are incorporated into design, with the Origin environmental advisor undertaking a final check of alignment widths prior to issue to Principal Contractor. Leighton (Combabula gathering network PC) advised during the site visit that alignment widths are reduced below the approved width where possible, provided that safety on the right of way is not compromised. Alignment sheets were requested during the audit, however were not able to be provided.	Gas and Water Gathering System - Potters Flat APLNG Phase 2 Property 21AB47 & 22AB47, Q-4200-95-MT-1002_02, Revision 1, 9/5/14 Gas and Water Gathering System - Nullin (2A) APLNG Sustain Phase Property 23AB47, Q-4200-95-MT-1005_02, Revision 1, 2/5/2015 Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014	Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	Compliant	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit.

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 5m.i)VII	VII. limited to an additional 10 metres for each additional high pressure gas pipeline or large diameter water pipeline (500mm or above);	Auditors advised that the approved alignment widths are incorporated into design, with the Origin environmental advisor undertaking a final check of alignment widths prior to issue to Principal Contractor. Leighton (Combabula gathering network PC) advised during the site visit that alignment widths are reduced below the approved width where possible, provided that safety on the right of way is not compromised. Alignment sheets were requested during the audit, however were not able to be provided.	Gas and Water Gathering System - Potters Flat APLNG Phase 2 Property 21AB47 & 22AB47, Q-4200-95-MT-1002_02, Revision 1, 9/5/14 Gas and Water Gathering System - Nullin (2A) APLNG Sustain Phase Property 23AB47, Q-4200-95-MT-1005_02, Revision 1, 2/5/2015 Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014	Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	Compliant	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit.
Criterion 5m.i)VIII	VIII. limited to disturbance within identified infrastructure corridors;	Auditors advised that the approved alignment widths are incorporated into design, with the Origin environmental advisor undertaking a final check of alignment widths prior to issue to Principal Contractor. Leighton (Combabula gathering network PC) advised during the site visit that alignment widths are reduced below the approved width where possible, provided that safety on the right of way is not compromised. Alignment sheets were requested during the audit, however were not able to be provided.	Gas and Water Gathering System - Potters Flat APLNG Phase 2 Property 21AB47 & 22AB47, Q-4200-95-MT-1002_02, Revision 1, 9/5/14 Gas and Water Gathering System - Nullin (2A) APLNG Sustain Phase Property 23AB47, Q-4200-95-MT-1005_02, Revision 1, 2/5/2015 Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014	Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	Compliant	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit.
Criterion 5m.i)IX	IX. where feasible, trenches, pipelines for associated water and other transmissions lines must be co-located to reduce total disturbance on MNES	Auditors advised that the approved alignment widths are incorporated into design, with the Origin environmental advisor undertaking a final check of alignment widths prior to issue to Principal Contractor. Leighton (Combabula gathering network PC) advised during the site visit that alignment widths are reduced below the approved width where possible, provided that safety on the right of way is not compromised. Alignment sheets were requested during the audit, however were not able to be provided.	Gas and Water Gathering System - Potters Flat APLNG Phase 2 Property 21AB47 & 22AB47, Q-4200-95-MT-1002_02, Revision 1, 9/5/14 Gas and Water Gathering System - Nullin (2A) APLNG Sustain Phase Property 23AB47, Q-4200-95-MT-1005_02, Revision 1, 2/5/2015 Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014	Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	Compliant	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit.
Criterion 5m.i)X	X. co-location will not be implemented where an assessment has determined that it is likely to increase impacts on MNES; and	Auditors advised that the approved alignment widths are incorporated into design, with the Origin environmental advisor undertaking a final check of alignment widths prior to issue to Principal Contractor. Leighton (Combabula gathering network PC) advised during the site visit that alignment widths are reduced below the approved width where possible, provided that safety on the right of way is not compromised. Alignment sheets were requested during the audit, however were not able to be provided.	Gas and Water Gathering System - Potters Flat APLNG Phase 2 Property 21AB47 & 22AB47, Q-4200-95-MT-1002_02, Revision 1, 9/5/14 Gas and Water Gathering System - Nullin (2A) APLNG Sustain Phase Property 23AB47, Q-4200-95-MT-1005_02, Revision 1, 2/5/2015 Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014	Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	Compliant	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit.
Note	Note 1: These widths include provision for a utility corridor and access track.			Evidence to verify that these widths include provision for a utility corridor and access track.	Review documentation and conduct a site inspection to determine that widths include provision for a utility corridor and access track.		The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	This is a note and does not require an evaluation
Criterion 5m.ii)	ii. In limited circumstances only (e.g. river crossings, where there are abnormal access constraints into a gas processing facility and when within close proximity to other proponent's linear infrastructure), increased corridor widths within areas of MNES may be required. In those circumstances a risk based site assessment will be completed to determine disturbance to MNES, identify management measures to minimise impacts to MNES and to justify the additional disturbance to MNES. The assessment will be available to the Department prior to any disturbance.		Australia Pacific LNG Gathering - Combabula, Griffin BC Zone 1A-2 Environmental Constraints Assessment, Q-4200-15-RP-1092, Revision: 0, 9 May 2013 Australia Pacific LNG Gathering - Combabula, Griffin BC Zone 0A-4 Environmental Constraints Assessment, Q-4200-15-RP-1093, Revision: 0, 7 March 2013	Evidence to verify this element has been implemented.	Review any associated risk based site assessments and verify any assessments have been made available to the Dept prior to disturbance.	Undetermined	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Auditors advised that gathering construction to date has not increased a corridor in MNES. Where this may have happened in design phase it would be captured in the environmental constraints assessment. The assessments provided did not discuss increased corridor width and it is undetermined if there was a requirement as per this condition.

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Note	Note: any disturbance referred to in this condition would be subtracted from the disturbance limits specified elsewhere in these conditions.			Evidence to verify that disturbances referred to in this condition have been subtracted from the disturbance limits specified elsewhere in these conditions	Review documentation and conduct a site inspection to determine that disturbances referred to in this condition have been subtracted from the disturbance limits specified elsewhere in these conditions		The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	This is a note and does not require an evaluation
Criterion 5n	n. support bioregional corridors for listed threatened species and migratory species, and connectivity for listed threatened ecological communities;	Bioregional corridors (regional and state) are mapped and groundtruthed. Bioregional corridor mapping is included with the standard environmental map suite of workpacks	Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014 Combabula Gathering System – Golden RG – Field Services Group (FSG), Drilling and Completions Environmental Workpack, Q-4200-15-WP-1044 Revision: 0, 16 April 2014 Combabula Gathering System – Golden & Wathen Zones 2A – Field Services Group (FSG) and Drilling Environmental Workpack, Q-4200-15-WP-1019 Revision: 0, 12 December 2012 Combabula Gathering System, Griffin BC, Pressure Zones 0A-4 & 1A-2 Environmental Workpack, Q-4200-15-WP-1027 Revision: 0, 31 May 2013 Reedy Creek Water Treatment Facility (WTF) - Lots 72WV619, 29WV630, 30WV630 and 34WV774 Environmental Workpack, Q-4240-15-WP-0001 Revision: 2, 21 November 2012 Reedy Creek Gas Processing Facility (GPF) Construction Environmental Workpack, Q-4231-15-WP-0001 Revision: 1, 16 November 2012 Combabula – Gas Processing Facility Earthworks, Road Works and Drainage Environmental Workpack, Q-4200-15-WP-1005 Revision: 2, 28 January 2014	Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	Compliant	The Department requires further information/clarification as the verification method is a combination of document review and site inspection. Was this requirement evidenced as having been met through site inspection?	Bioregional corridors (regional and state) are mapped and groundtruthed. Bioregional corridor mapping is included with the standard environmental map suite of workpacks. Bioregional corridors were not identified during the site audit.
Criterion 5o	o. ensure site assessments and field ecological surveys:							
Criterion 5o.i)	i. are undertaken in accordance with the Department's survey guidelines in effect at the time of the survey. This information can be obtained from http://www.environment.gov.au/epbc/guidelines-policies.html#threatened;	The ecology assessment reports state that scouting surveys were conducted in general accordance with the BioCondition – A Condition Assessment Framework for Terrestrial Biodiversity in Queensland – Assessment Manual – Version 2.1 (BioCondition Manual) (Eyre et al., 2011) and the Methodology for Survey and Mapping of Regional Ecosystems and Vegetation Communities in Queensland (Neldner et al., 2005). The DSEWPaC Survey Guidelines for Australia's Threatened Reptiles state that "Typically, in the temperate parts of Australia, most reptile species are best surveyed in late spring and early summer, and should not be surveyed between May and September", dependent on weather. The pre-clearance surveys provided were conducted between the months of October and April.	Ecology Assessment Report 21AB47, 22AB47, 24AB142, Q-4200-15-RP-1024 Revision: 0, 30May 2013 Lot 25AB50 Ecology Assessment Report, Q-4200-15-RP-1013 Revision: 0, 16 May 2012 Ecology Assessment Report Lot 23 AB47, Q-4200-15-PR-1010, Revision 0, 2 February 2012 Lot 3 on AB195 Ecology Assessment Report, Q-4500-15-RP-1005 Revision: 0, 30 January 2013 Ecology Assessment Report Lot 2 AB196, Q-4500-15-RP-1025 Revision: 0, 19 September 2012 Ecology Assessment Report Lot 1 AB78, Q-4500-15-RP-1027 Revision: 0, 22 January 2013 DSEWPaC Survey Guidelines for Australia's Threatened Reptiles, http://www.environment.gov.au/system/files/resources/eba674a5-b220-4ef1-9f3a-b9ff3f08a959/files/survey-guidelines-reptiles.pdf	Evidence to verify this element has been implemented.	Review documentation to verify site assessments and ecological surveys are undertaken in accordance with Dept guidelines	Compliant		
Criterion 5o.ii)	ii. take into account and reference previous ecological surveys undertaken in the area and relevant new information on likely presence or absence of MNES;	The Potters Flat pre-clearance survey report refers to previous ecology reports. The remainder of pre-clearance surveys (1A-3, Crosby, Keys) viewed during the audit do not provide a reference to previous reports. The ecology assessment reports state that the assessment includes a "review of any existing documentation published within the locale."	Ecology Assessment Report 21AB47, 22AB47, 24AB142, Q-4200-15-RP-1024 Revision: 0, 30May 2013 Lot 25AB50 Ecology Assessment Report, Q-4200-15-RP-1013 Revision: 0, 16 May 2012 Ecology Assessment Report Lot 23 AB47, Q-4200-15-PR-1010, Revision 0, 2 February 2012 Lot 3 on AB195 Ecology Assessment Report, Q-4500-15-RP-1005 Revision: 0, 30 January 2013 Ecology Assessment Report Lot 2 AB196, Q-4500-15-RP-1025 Revision: 0, 19 September 2012 Ecology Assessment Report Lot 1 AB78, Q-4500-15-RP-1027 Revision: 0, 22 January 2013 Pre-clearance survey report: R. Golden 'Potters Flat', Lot 21 on Plan AB47, Lot 22 on Plan AB47 and Lot 24 on Plan AB142, Combabula Tenement. Boobook, Revision 0, 23 January 2014 Australia Pacific LNG preclearance ecological assessment: Griffin BC pressure zone 1A-3, Ausecology, Revision 0, November 2013 Preclearance Survey of: Lot 7 on plan RG18, Lot 19 on plan RG189, Lot 20 on plan RG18, and Lot 38 on plan RG68, AMEC, Revision 0, February 2013 Pre-clearing Survey in Relation to Lot 18 SP133341 (Crosby Property), New Ground, 12 February 2013	Evidence to verify this element has been implemented.	Review of documentation to determine implementation of this condition.	Not compliant		
Criterion 5o.iii)	iii. are undertaken by a suitably qualified ecologist approved by the Department for sensitivity categories 1-4;	Refer to condition 5.c) It is not clear which sensitivity category the pre-clearance surveys have been conducted in. Therefore, it was not able to be determined if an approved ecologist was required to undertake the survey.	Australia Pacific LNG preclearance ecological assessment: Griffin BC pressure zone 1A-3, Ausecology, Revision 0, November 2013 Pre-clearance survey report: R. Golden 'Potters Flat', Lot 21 on Plan AB47, Lot 22 on Plan AB47 and Lot 24 on Plan AB142, Combabula Tenement. Boobook, Revision 0, 23 January 2014 Preclearance Survey of: Lot 7 on plan RG18, Lot 19 on plan RG189, Lot 20 on plan RG18, and Lot 38 on plan RG68, AMEC, Revision 0, February 2013 Pre-clearing Survey in Relation to Lot 18 SP133341 (Crosby Property), New Ground, 12 February 2013 Letter from James Barker to Katherine Jack, Company approval of ecologists: EPBC2009/4974, EPBC 2009/4976 and EPBC 2009/4977, dated 28 June 2011 Letter from Shane Gaddes to Rob Ully, Approval of suitably qualified ecologists under the EPBC Act approvals 2007/4974, 2008/4976 and 2008/4977. Dated 10 December 2012. Letter from Shane Gaddes to Rob Ully, Approval of suitably qualified ecologists under the EPBC Act approvals 2007/4974, 2008/4976 and 2008/4977. Dated 18 February 2013. Letter from Shane Gaddes to Rob Ully, Approval of suitably qualified ecologists under the EPBC Act approvals 2007/4974, 2008/4976 and 2008/4977. Dated 13 September 2013. Letter from Shane Gaddes to Rob Ully, Approval of suitably qualified ecologists under the EPBC Act approvals 2007/4974, 2008/4976 and 2008/4977. Dated 18 February 2013. Letter from James Barker to Katherine Jack, dated 11 May 2011	Evidence to verify this element has been implemented.	Review documentation to verify these site assessments and ecological surveys were undertaken by suitably qualified and approved ecologists.	Compliant	The Department requires further information/clarification as a representative sample of site assessments for sensitivity category 1 - 4 should have been identified and selected for review. These items are to be separately measured and assigned compliance findings in the audit report.	Four preclearance surveys were sampled and sighted: -Griffin BC pressure zones 1A-3 (New Ground) -Potters Flat (Boobook) -Crosby Property (New Ground) -Keys Property (AMEC) It was not clear from these pre-clearance surveys whether the sites are located in sensitivity categories 1-4 which makes identification of a representative sample difficult. The sample size was determined in line with the approach to identification of locations for the site visit. As approved ecologists were used in all cases that were audited, this improved the auditors confidence that this condition was complied with. Griffin BC: New Ground received company approval to undertake pre-clearance surveys on 28 June 2011 Potters Flat: Boobook received company approval to undertake pre-clearance surveys on 28 June 2011. Approval for Crosby Property New Ground ecologists sighted in 2 letters from the Department (10 December 2012 and 18 February 2013) Keys Property: AMEC ecologists, James Gubby and Trevor Meers, approved for terrestrial flora and terrestrial fauna respecitively, on 31 July 2012.

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 5o.iv)	iv. are undertaken by a suitably qualified environment officer for sensitivity categories 5-7;		Australia Pacific LNG preclearance ecological assessment: Griffin BC pressure zone 1A-3, Ausecology, Revision 0, November 2013 Pre-clearance survey report: R. Golden 'Potters Flat', Lot 21 on Plan AB47, Lot 22 on Plan AB47 and Lot 24 on Plan AB142, Combabula Tenement. Boobook, Revision 0, 23 January 2014 Preclearance Survey of: Lot 7 on plan RG18, Lot 19 on plan RG189, Lot 20 on plan RG18, and Lot 38 on plan RG68, AMEC, Revision 0, February 2013 Pre-clearing Survey in Relation to Lot 18 SP133341 (Crosby Property), New Ground, 12 February 2013 Letter from James Barker to Katherine Jack, Company approval of ecologists: EPBC2009/4974, EPBC 2009/4976 and EPBC 2009/4977, dated 28 June 2011 Letter from Shane Gaddes to Rob Ully, Approval of suitably qualified ecologists under the EPBC Act approvals 2007/4974, 2008/4976 and 2008/4977. Dated 10 December 2012. Letter from Shane Gaddes to Rob Ully, Approval of suitably qualified ecologists under the EPBC Act approvals 2007/4974, 2008/4976 and 2008/4977. Dated 18 February 2013. Letter from Shane Gaddes to Rob Ully, Approval of suitably qualified ecologists under the EPBC Act approvals 2007/4974, 2008/4976 and 2008/4977. Dated 13 September 2013. Letter from Shane Gaddes to Rob Ully, Approval of suitably qualified ecologists under the EPBC Act approvals 2007/4974, 2008/4976 and 2008/4977. Dated 18 February 2013. Letter from James Barker to Katherine Jack, dated 11 May 2011	Evidence to verify this element has been implemented.	Review documentation to verify these were undertaken by suitably qualified environment officers.	Compliant	The Department requires further information/clarification as a representative sample of site assessments for sensitivity category 5 - 7 should have been identified and selected for review. These items are to be separately measured and assigned compliance findings in the audit report.	Four preclearance surveys were sighted: -Griffin BC pressure zones 1A-3 (New Ground) -Potters Flat (Boobook) -Crosby Property (New Ground) -Keys Property (AMEC) In all cases, approved ecologists were used to carry out the pre-clearance assessments (see response to condisiton 5c) and are therefore considerd to be suitably qualified.
Criterion 5o.v)	v. document the survey methodology, results and significant findings in relation to MNES.	The pre-clearance surveys and ecology assessment reports each include sections documenting survey methodology, results and significant findings.	Ecology Assessment Report 21AB47, 22AB47, 24AB142, Q-4200-15-RP-1024 Revision: 0, 30May 2013 Lot 25AB50 Ecology Assessment Report, Q-4200-15-RP-1013 Revision: 0, 16 May 2012 Ecology Assessment Report Lot 23 AB47, Q-4200-15-PR-1010, Revision 0, 2 February 2012 Lot 3 on AB195 Ecology Assessment Report, Q-4500-15-RP-1005 Revision: 0, 30 January 2013 Ecology Assessment Report Lot 2 AB196, Q-4500-15-RP-1025 Revision: 0, 19 September 2012 Ecology Assessment Report Lot 1 AB78, Q-4500-15-RP-1027 Revision: 0, 22 January 2013 Australia Pacific LNG preclearance ecological assessment: Griffin BC pressure zone 1A-3, Ausecology, Revision 0, November 2013 Pre-clearance survey report: R. Golden 'Potters Flat', Lot 21 on Plan AB47, Lot 22 on Plan AB47 and Lot 24 on Plan AB142, Combabula Tenement. Boobook, Revision 0, 23 January 2014 Preclearance Survey of: Lot 7 on plan RG18, Lot 19 on plan RG189, Lot 20 on plan RG18, and Lot 38 on plan RG68, AMEC, Revision 0, February 2013 Pre-clearing Survey in Relation to Lot 18 SP133341 (Crosby Property), New Ground, 12 February 2013	Evidence to verify this element has been implemented.	Review documentation to verify the implementation of this condition.	Compliant		
Criterion 5o.vi)	vi. apply best practice site assessment and ecological survey methods appropriate for each listed threatened species, migratory species, their habitat and listed ecological communities as detailed in the Protocol;	The ecology assessment reports state that scouting surveys were conducted in general accordance with the BioCondition – A Condition Assessment Framework for Terrestrial Biodiversity in Queensland – Assessment Manual – Version 2.1 (BioCondition Manual) (Eyre et al., 2011) and the Methodology for Survey and Mapping of Regional Ecosystems and Vegetation Communities in Queensland (Neldner et al., 2005). The DSEWPaC Survey Guidelines for Australia's Threatened Reptiles state that "Typically, in the temperate parts of Australia, most reptile species are best surveyed in late spring and early summer, and should not be surveyed between May and September", dependent on weather. The pre-clearance surveys provided were conducted between the months of October and April.	Ecology Assessment Report 21AB47, 22AB47, 24AB142, Q-4200-15-RP-1024 Revision: 0, 30May 2013 Lot 25AB50 Ecology Assessment Report, Q-4200-15-RP-1013 Revision: 0, 16 May 2012 Ecology Assessment Report Lot 23 AB47, Q-4200-15-PR-1010, Revision 0, 2 February 2012 Lot 3 on AB195 Ecology Assessment Report, Q-4500-15-RP-1005 Revision: 0, 30 January 2013 Ecology Assessment Report Lot 2 AB196, Q-4500-15-RP-1025 Revision: 0, 19 September 2012 Ecology Assessment Report Lot 1 AB78, Q-4500-15-RP-1027 Revision: 0, 22 January 2013 DSEWPaC Survey Guidelines for Australia's Threatened Reptiles, http://www.environment.gov.au/system/files/resources/eba674a5-b220-4ef1-9f3a-b9ff3f08a959/files/survey-guidelines-reptiles.pdf	Evidence to verify this element has been implemented.	Review documentation to verify the implementation of this condition.	Compliant		
Criterion 5o.vii)	Note: Best practice includes applying the optimum timing and frequency of site assessments and surveys to determine presence of listed threatened species or migratory species or their habitat, or a listed threatened ecological community.	The DSEWPaC Survey Guidelines for Australia's Threatened Reptiles state that "Typically, in the temperate parts of Australia, most reptile species are best surveyed in late spring and early summer, and should not be surveyed between May and September", dependent on weather. The pre-clearance surveys provided were conducted between the months of October and April.	Ecology Assessment Report Lot 23 AB47, Q-4200-15-PR-1010, Revision 0, 2 February 2012 DSEWPaC Survey Guidelines for Australia's Threatened Reptiles, http://www.environment.gov.au/system/files/resources/eba674a5-b220-4ef1-9f3a-b9ff3f08a959/files/survey-guidelines-reptiles.pdf	Evidence to verify the information contained within this note has been implemented.	Review documentation to verify the implementation of best practice methodology, including optimum timing and frequency of site assessments and surveys to determine presence of listed threatened species or migratory species or their habitat, or a listed threatened ecological community.	Compliant		
Criterion 5o.viii)	vii. apply the mapping of environmental constraints class sensitivity category 1-4; the infrastructure location requirements; minimum no impact zones; impact risk zones; and the width requirements for linear infrastructure corridors described in (m);	The ecology assessment reports and pre-clearance reports provide ground truthed environmental information, which is required to update the data identified in desktop assessment. The application of constraints and sensitivity reports is conducted separately.	Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014 Combabula Gathering System – Golden RG – Field Services Group (FSG), Drilling and Completions Environmental Workpack, Q-4200-15-WP-1044 Revision: 0, 16 April 2014 Combabula Gathering System – Golden & Wathen Zones 2A – Field Services Group (FSG) and Drilling Environmental Workpack, Q-4200-15-WP-1019 Revision: 0, 12 December 2012 Combabula Gathering System, Griffin BC, Pressure Zones 0A-4 & 1A-2 Environmental Workpack, Q-4200-15-WP-1027 Revision: 0, 31 May 2013 Reedy Creek Water Treatment Facility (WTF) - Lots 72WV619, 29WV630, 30WV630 and 34WV774 Environmental Workpack, Q-4240-15-WP-0001 Revision: 2, 21 November 2012 Reedy Creek Gas Processing Facility (GPF) Construction Environmental Workpack, Q-4231-15-WP-0001 Revision: 1, 16 November 2012 Combabula – Gas Processing Facility Earthworks, Road Works and Drainage Environmental Workpack, Q-4200-15-WP-1005 Revision: 2, 28 January 2014	Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	Compliant	The Department requires further information/clarification to confirm that the requirement to: 'apply the mapping of environmental constraints class sensitivity category 1-4; the infrastructure location requirements; minimum no impact zones; impact risk zones; and the width requirements for linear infrastructure corridors described in (m)' has been implemented.	The preliminary design/alignment of infrastructure involves a desktop assessment taking into account the requirements of the Protocol. These requirements include, but are not limited to, environmentally sensitive areas, BAAM sensitivity mapping, bioregional corridors, watercourses, and soils. The preliminary design is then field scouted to identify potential environmental constraints not previously identified in the desktop assessment. This includes ground-truthing mapped environmental constraints for accuracy (pre-clearance field ecological assessment). The design is refined based on ground-truthed environmental constraints (i.e. avoidance of MNES), with planning decisions documented in an Environmental Constraints Assessment. Where impacts to MNES are unavoidable in the final design, the justification for disturbance has previously been recorded in Squad Checks. Key environmental values and management requirements of the final design are provided as an Environmental Workpack. The workpack is accompanied by a hold point list which requires sign off by field personnel at various stages of development to ensure activities do not proceed without the necessary approvals.
Criterion 5p	viii. reports are published by the proponent on the internet 20 business days before clearance of native vegetation in an infrastructure impact area and provided to the Department on request;	Pre-clearance surveys are published at http://www.aplng.com.au/environment/pre-clearance-surveys Evidence was not able to be provided documenting upload of the surveys within the required timeframe.		Evidence to verify this element has been implemented.	Review APLNG website and verify timing before clearing native vegetation.	Undetermined		

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments
Criterion 5p.i)	p. require species and ecological community management plans which include:	The following plans have been developed by Australia Pacific LNG and approved by the Department of Sustainability, Environment, Water, Population and Communities (SEWPaC) (now Department of the Environment): -Threatened Fauna Management Plan -Threatened Flora Management Plan -Threatened Ecological Community Management Plan	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012 Letter from James Barker (SEWPaC) to Katherine Jack (Australia Pacific LNG) dated 1 September 2011. Australia Pacific LNG reference Q-LNG01-15-EA-0061			Compliant		
Criterion 5p.ii)	i. relevant avoidance and mitigation measures to be applied;	This is addressed in Sections 3 of the TECMP and TFLMP. This is addressed in Sections 2.15, 3.12, 4.5, 5.7, 6.5, 7.6, 8.5, and 9 of the TFMP. Site implementation is addressed on the Condition 8 implementation compliance evaluation table.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Evidence to verify this element has been implemented.	Review of Plans and site inspection to determine implementation of this condition.	Compliant		
Criterion 5q	ii. measures for protecting each listed threatened species and migratory species and their habitat, and each listed threatened ecological community not previously assessed by the proponent, should one or more be found in the project area at any time over the life of the project. Any such management plans must be developed in a timeframe to be approved by the Department. Notification of additional MNES found must be provided to the Department in writing within 10 business days. Measures must include the development of a management plan consistent with requirements under condition 8; and	This is addressed in Sections 1.1 of the TECMP, TFLMP and TFMP. "Separate management plans will be submitted to SEWPaC should a listed TEC which is not included in this TECMP be identified during the lifecycle of the gas field component of the project Notification of additional MNES found will be provided to DSEWPaC within 10 business days in accordance with Condition 5(p)." Site implementation is addressed on the Condition 8 implementation compliance evaluation table.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Evidence to verify this element has been implemented.	Review of Plans and site inspection to determine implementation of this condition.	Compliant		
	q. ensure constraints planning and field development decisions are made in accordance with the Protocol (including any relevant species and ecological community management plans) before final selection of specific sites for gas field development within the project area.	Squad checks sighted for the following infrastructure: -CMN153-1 -CMN170-2 -CMN236-2 -CMN280-1 -CMN263-3 -CMN281-3 -CMN153 -CMN194 -CMN255 -CMN280	EPBC squad check justification spreadsheet for TEC disturbance in Combabula pressure zone 2A, Golden RG, Griffin BC, Pressure Zones 0A-4 and 1A-2	Evidence to verify this element has been implemented.	Review of Plans and site inspection to determine implementation of this condition.	Compliant	The Department requires further information/clarification to confirm that the requirement to: 'ensure constraints planning and field development decisions are made in accordance with the Protocol (including any relevant species and ecological community management plans) before final selection of specific sits for gas field development within the project area' has been implemented.	The preliminary design/alignment of infrastructure involves a desktop assessment taking into account the requirements of the Protocol. These requirements include, but are not limited to, environmentally sensitive areas, BAAM sensitivity mapping, bioregional corridors, watercourses, and soils. The preliminary design is then field scouted to identify potential environmental constraints not previously identified in the desktop assessment. This includes ground-truthing mapped environmental constraints for accuracy (pre-clearance field ecological assessment). The design is refined based on ground-truthed environmental constraints (i.e. avoidance of MNES), with planning decisions documented in an Environmental Constraints Assessment. Where impacts to MNES are unavoidable in the final design, the justification for disturbance has previously been recorded in Squad Checks. Key environmental values and management requirements of the final design are provided as an Environmental Workpack. The workpack is accompanied by a hold point list which requires sign off by field personnel at various stages of development to ensure activities do not proceed without the necessary approvals.

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department Response	Updated independent auditor comments

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department's Response	Updated independent auditor comments
EPBC Approval Condition 8	The management plans required under condition 7 must be developed by a qualified ecologist approved in writing by the Department and as a minimum address the following as is relevant to each MNES:							
Criterion 8a	a. current legal status (under EPBC Act);			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	Not applicable		
Criterion 8b	b. known distribution;			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	Not applicable		
Criterion 8c	c. known species' populations and their relationships within the region;			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	Not applicable		
Criterion 8d	d. extent of ecological community fragmentation within the region and if appropriate minimum patch size for that community;			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	Not applicable		
Criterion 8e	e. to support field identification and ecological surveys, description of the relevant characteristics of the ecological community;			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	Not applicable		
Criterion 8f	f. species' biology, reproduction and description of general habitat;			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	Not applicable		
Criterion 8g	g. to support field identification and ecological surveys, description of the species' habitat, which may be described in terms of essential habitat and microhabitat, associations with geology, soils, landscape features, associations with other native fauna and/or flora or ecological communities, and specific niche habitat descriptions;			Not applicable.	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	Not applicable		
Note	Note: Constraints mapping may be limited by available data for many species and may therefore be inadequate to map habitat requirements for planning and management purposes, or to indicate presence without on ground assessment. Condition 8 g) requires the essential components of a species' habitat to be described where relevant to support field identification and environmental constraints decision making. This should include essential habitat components for widely distributed species present in low numbers and for other species likely to be present but not often observed.			This is for information only.	Not audited as it relates to inclusion of information to be covered in the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	Not applicable		
Criterion 8h	h. threats to MNES relating to the development and management of land within the gas fields including from the development, operation and decommissioning of infrastructure within the gas fields; and from groundwater extraction and aquifer depressurisation, CSG water use and disposal, whether the threat is within or outside the gas field development area;			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	Not applicable		
Note	Note: This part of a management plan may also indicate that a species or its habitat can co-exist with specific types of gas field operations.			This is for information only.	This is for information only	Not applicable		

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department's Response	Updated independent auditor comments
Criterion 8i	i. relevant management practices and methods to minimise impact and recover from impact that should include:	Management practices in the species management plans include high visibility fencing and signage around TECs, briefing of MNES significance in toolbox talks and inductions, sign off of specific practices on the workpack hold point list, checklists and no barbed wire on the top rung of fencing. During the site visit the auditors observed the above requirements implemented along the gathering, drilling and gas field facility sites. Fauna records were reviewed for interaction with MNES species.	D&C Field Checklist Construction Environmental Compliance, Com280, Q-LNG-01-15-AQ-0523, 20 May 2014 Drilling fauna register, current to June 2014 Lease construction and drilling activities Environmental Induction Golden Wathem 2A Drilling Hold Point list - signed Golden RG Drilling Hold Point list - signed ESC Maintenance Register Nullin 2A, current to January 2015 ESA toolbox talk 24 May 2014 Gathering Weekly Environmental Inspection Checklist 28 August 2014, 30 August 2014, 20 September 2014, 17 October 2014, 25 January 2015 Kick-off Toolbox Talk Record RG Golden Construction 29 November 2014. Fauna Register, current to 26 January 2015 Golden RG, Commissioning System CM033, Hold Points list - signed Golden RG, Commissioning System CM034, Hold Points list - signed Gas Processing Facility Toolbox talks on fauna and TECs near project site, induction 28 March 2014 and 7 May 2014 Toolbox talk 8 May 2014 Weekly checklist 21 November 2013 Laing O'Rourke Environmental Site Induction QFC Fauna Management and Spotter/Catcher Services Report August 2014 and October 2014	Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation. Note this is not mandatory	Compliant		
Criterion 8i.i)	i. site rehabilitation timeframes, standards and methods;	Rehabilitation was observed within the gathering, drilling and facilities areas at Combabula. It was noted that timeframes for rehabilitation are often dependent of other factors (e.g. well leases cannot be rehabilitated until gathering infrastructure is installed).	Hold Points List Combabula Gathering System – Golden RG, Commissioning System CM034 Q-4200-15-1053_02 Revision: A, 5 September 2014 Hold Points List Combabula Gathering System – Golden RG, Commissioning System CM033, Q-4200-15-1053_01 Revision: A, 5 September 2014	Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation. Note this is not mandatory	Compliant	The Department requires further information/clarification to confirm whether rehabilitation time-frames, standards and methods are prescribed in the management plan(s). If so, we require a more definitive statement that they were implemented.	This is addressed in Section 1.11 of the TFMP, Section 1.11 of the TFLMP and Section 1.11 of the TECMP. Rehabilitation was observed within the gathering, drilling and facilities areas at Combabula. It was noted that timeframes for rehabilitation are often dependent of other factors (e.g. well leases cannot be rehabilitated until gathering infrastructure is installed). Hold points lists require sign off against rehabilitation objectives. No fully completed hold points lists were provided during the audit.
Criterion 8i.ii)	ii. use of sequential clearing to direct fauna away from an impact zone;	Discussions were held with on site personnel during the site visit. A clearing front for the gathering network (CMN114) was observed and the audit team discussed the process with the Queensland Fauna Consultancy fauna spotter on site. Auditors were advised that 2-3 days prior to clearing, fauna spotters engage in habitat load reduction and tagging of habitat trees. During clearing of the right of way, habitat trees are left overnight. Trees cleared the previous day are checked for fauna prior to mulching. Due to the linear nature of the gathering network, clearing is sequential. A similar process was described for the drilling and completions team (well leases cleared from one direction), and gas processing facility (most clearing is at the edge of vegetation).		Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation. Note this is not mandatory	Compliant	The Department requires further information/clarification to confirm whether this requirement was actually evidenced during the site inspection?	Discussions were held with on site personnel during the site visit. A clearing front for the gathering network (CMN114) was observed and the audit team discussed the process with the Queensland Fauna Consultancy fauna spotter on site. Auditors were advised that 2-3 days prior to clearing, fauna spotters engage in habitat load reduction and tagging of habitat trees. During clearing of the right of way, habitat trees are left overnight. Trees cleared the previous day are checked for fauna prior to mulching. Due to the linear nature of the gathering network, clearing is sequential. The clearing front identified during the site inspection was in a sequential direction adjacent to the access road. A similar process was described for the drilling and completions team (well leases cleared from one direction), and gas processing facility (most clearing is at the edge of vegetation).

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding	Department's Response	Updated independent auditor comments
Criterion 8i.iii)	iii. re-establishment of native vegetation in linear infrastructure corridors;	Several linear infrastructure corridors associated with the gathering network were observed to have been revegetated. Topsoil management provides a seed bank, and where this is insufficient a seed mix is sourced. The content of the seed mix is dependent on the landowners requirements. It was noted that where native vegetation is re-established, the seed mix is sourced locally.	Discussions with on site personnel, incldluing principal contractors.	Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation. Note this is not mandatory	Compliant		
Criterion 8i.iv)	iv. welfare and safe handling of fauna specimens requiring relocation from impact sites;	No relocation of fauna was observed during the site visit. Fauna registers and spotter reports reviewed for drilling, gathering and facilities teams. Relocations are regularly recorded.	QFC Fauna Management and Spotter/Catcher Services Report August 2014 and October 2014 Drilling fauna register, current to June 2014 Gathering Fauna Register, current to 26 January 2015 Field Delivery technical instruction Fauna Protection - Clearing, Q-LNG01-15-TI-0026 Revision: 0, 31 July 2014	Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation. Note this is not mandatory	Compliant	The Department requires further information/clarification to confirm that: 'welfare and safe handling of fauna specimens requiring relocation from impact sites' was implemented.	The Field Delivery technical instruction Fauna Protection - Clearing details requirements for the implementation of this condition including safe handling and relocation practices of fauna. No relocation of fauna was observed during the site visit. Fauna registers and spotter reports reviewed for drilling, gathering and facilities teams. Relocations are regularly recorded.
Criterion 8i.v)	v. handling practices for flora specimens;	No handling of flora specimens was observed on site.		Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation. Note this is not mandatory	Not applicable	The Department requires further information/clarification to confirm whether there has been a requirement to handle flora specimens? The audit should have established whether this requirement has been triggered.	Auditors advised that this requirement has not been triggered. No handling of flora specimens was observed during the site inspection.
Criterion 8i.vi)	vi. translocation practices and monitoring for translocation success;	No evidence of translocation and monitoring provided.		Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation. Note this is not mandatory	Not applicable	The Department requires further information/clarification to confirm whether there been a requirement to translocate species and monitor translocation success? The audit should have established whether this requirement has been triggered.	Auditors advised that this requirement has not been triggered.
Criterion 8h.vii)	vii. monitoring methods including for rehabilitation success and recovery;	No records of rehabilitation monitoring provided. Auditors advised that a document relating to translocation is currently being developed.		Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation. Note this is not mandatory	Not applicable	The Department requires further information/clarification to confirm whether there has been a requirement to establish monitoring methods including rehabilitation success and recovery? The audit should have established whether this requirement has been triggered.	Auditors advised that this requirement has not been triggered.
Criterion 8j	j. surface and ground water quality and quantity requirements, including relevant downstream environmental quality parameters;	A culvert is under construction adjacent to a TEC at the gas processing facility site. Auditors advised that, a check was made of the culvert prior to recent rain, and downstream erosion and sediment control was implemented. This was observed by site personnel to prevent sediment flowing into the TEC. No evidence of watercourse interaction with gathering or drilling was observed during the site visit. Extensive evidence of erosion and sediment control maintenance conducted after a recent rain event was observed during the site audit.	Site audit	Evidence to verify this element has been implemented.	Field inspection of water courses with MNES to examine condition of water courses, e.g. no evidence of pollution or degradation.	Compliant	The Department requires further information/clarification to confirm whether any monitoring/inspection records were reviewed to ground-truth that surface and ground water quality and quantity controls were in place including any parameters measured?	A culvert is under construction adjacent to a TEC at the gas processing facility site. Auditors advised that, a check was made of the culvert prior to recent rain, and downstream erosion and sediment control was implemented. This was observed by site personnel to prevent sediment flowing into the TEC. No evidence of watercourse interaction with gathering or drilling was observed during the site visit. Extensive evidence of erosion and sediment control maintenance conducted after a recent rain event was observed during the site audit. No water quality records reviewed during the audit, and the compliance evaluation is based on the auditors observations during the site inspection.

APPENDIX B DEPARTMENT OF THE ENVIRONMENT AUDIT REPORT REVIEW

INDEPENDENT AUDIT REPORT ITEMS WHERE THE DEPARTMENT HAS A DIFFERING INTERPRETATION ON THE FINDINGS:

APPROVAL CONDITIONS:

Criterion 13 - If an impact occurs (which may include a presumed impact where the species is presumed to be present) to a MNES during gas field development, operation, or decommissioning the proponent must:			
a. record the impact by reference to:			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
i. the location, specific site and type of infrastructure or activity;	The location, specific site and type of activity is recorded in a spreadsheet (sighted). This is linked to GIS data, with the corresponding figures viewed by the auditors. **Compliant.**	If potential habitat for listed fauna is not being recorded the Department considers that this constitutes **non-compliance**.	The location, specific site and type of activity is recorded in a spreadsheet (sighted). This is linked to GIS data, with the corresponding figures viewed by the auditors. This is considered to be a sub-condition of condition 13 and a compliance evaluation independent of the other sub-conditions has been given. The auditors note that decisions relating to disturbance of potential habitat have not been recorded, however this sub-condition relates to the documentation of the location, sspecific site and type of infrastructuce and the auditors assessed that the requirements have been met through the documentation sighted
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
vii. the reasons for the decision including justification for the action taken, description of the efforts taken to avoid impact, and explanation why other constraints might justify the impact on MNES;	Justification for phase one has been recorded in squad checks (gated design refinement). Future disturbance justification is to be recorded in a TEC drawdown approval process. Squad checks sighted for the following infrastructure: -CMN153-1 -CMN170-2 -CMN236-2 -CMN280-1 -CMN263-3 -CMN281-3 -CMN153 -CMN194 -CMN255 -CMN280 **Compliant.**	If potential habitat for listed fauna is not being recorded the Department considers that this constitutes **non-compliance**.	Justification for phase one has been recorded in squad checks (gated design refinement). Future disturbance justification is to be recorded in a TEC drawdown approval process. Squad checks sighted for the following infrastructure: -CMN153-1 -CMN170-2 -CMN236-2 -CMN280-1 -CMN263-3 -CMN281-3 -CMN153 -CMN194 -CMN255 -CMN280 This is considered to be a sub-condition of condition 13 and a compliance evaluation independent of the other sub-conditions has been given. The auditors note that decisions relating to disturbance of potential habitat have not been recorded, however this sub-condition relates to the documentation of the decision making process and the auditors assessed that the requirements have been met through the documentation sighted.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
viii. actions and commitments by the proponent to remediate, rehabilitate, or make good any unauthorised disturbance;	Auditors advised that no unauthorised disturbance has occurred to matters of national environmental significance. A compliance register was sighted by the auditors, however this was limited to incidents open at the time of the audit. **Compliant.**	The Department requires further information/clarification as both closed and open compliance incidents should have been reviewed to ground-truth the statement that no unauthorised disturbance to MNES has occurred. If potential habitat for listed fauna is not being recorded the Department considers that this constitutes **non-compliance**	A compliance register was sighted by the auditors. It was previously misunderstood to be limited to incidents open at the time of the audit, however, clarification was provided by Australia Pacific LNG that the compliance register covers all incident / compliance records relevant to MNES irrespective of status (open / closed). Unauthorised disturbance has occurred to matters of national environmental significance according to the compliance register. Immediate actions by the proponent to make good this disturbance is noted in the compliance register. It is understood that investigations are undertaken and, where, required, reports provided to the administering authority. This is considered to be a sub-condition of condition 13 and a compliance evaluation independent of the other sub-conditions has been given. The auditors note that records relating to disturbance of potential habitat have not been maintained, however this sub-condition relates to the documentation of actions undertaken to make good unauthorised disturbance and the auditors assessed that the requirements have been met through the documentation sighted.

Criteria:	Finding:	Department's Response:	Auditors' Response:
b. record the information to a standard which can be independently audited.	The TEC spreadsheet incorporating GIS attributes is auditable for disturbance calculations. The justification for disturbance is recorded separately. Documentation for two properties where TEC disturbance was observed was requested for review by the auditors. **Compliant.**	As records are not being maintained to confirm that extent of actual clearing of potential habitat for fauna species the Department considers that this constitutes **non-compliance** with the requirement to maintain records that can be independently audited.	This is considered to be a sub-condition of condition 13 and a compliance evaluation independent of the other sub-conditions has been given. The auditors note that decisions relating to disturbance of potential habitat have not been recorded, however this sub-condition relates to the auditability of the documentation and the auditors assessed that the requirements have been met through the documentation sighted.
Table 3 - Disturbance limits for listed species			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
Egernia rugosa (Yakka Skink)	Condition 13 of the approval requires disturbance to MNES to be recorded. Records were provided for disturbance to TECs during the audit, however the auditors were advised that disturbance to potential habitat for threatened fauna is not currently documented. As potential habitat is not recorded, it could not be determined that current disturbance levels are within the limit required by Condition 25. It is understood that classification of potential habitat is the subject of ongoing discussion between Origin and the Department. **Undetermined.**	Despite the fact that Origin Energy are in ongoing consultation with the Department regarding 'potential habitat' the fact that disturbance limits are not being recorded constitutes **non-compliance**.	Disturbance to potential habitat for listed fauna is not recorded. As per the Department of the Environment's audit criteria and methodolgy, a rating of 'undetermined' has been given as the condition falls inside the scope of the audit, but there is insufficient evidence to make a judgement on compliance or non-compliance.
Furina dunmalli (Dunmall's Snake)	Condition 13 of the approval require disturbance to MNES to be recorded. Records were provided for disturbance to TECs during the audit, however the auditors were advised that disturbance to potential habitat for threatened fauna is not currently documented. As potential habitat is not recorded, it could not be determined that current disturbance levels are within the limit required by Condition 25. It is understood that classification of potential habitat is the subject of ongoing discussion between Origin and the Department. **Undetermined.**	Despite the fact that Origin Energy are in ongoing consultation with the Department regarding 'potential habitat' the fact that disturbance limits are not being recorded constitutes **non-compliance**.	Disturbance to potential habitat for listed fauna is not recorded. As per the Department of the Environment's audit criteria and methodolgy, a rating of 'undetermined' has been given as the condition falls inside the scope of the audit, but there is insufficient evidence to make a judgement on compliance or non-compliance.

IMPLEMENTATION OF THE ENVIRONMENTAL CONSTRAINTS PLANNING AND FIELD DEVELOPMENT PROTOCOL

EPBC Approval Condition 5. The Protocol must:			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
i. calculate disturbance as required in condition 13;	Refer to condition 13 for compliance assessment	This item should be assigned **non-compliance** - as identified under Condition 13.	By virtue of non-compliance with some sub-conditions of Condition 13, the requirements of this condition are not considered to be met.
When siting linear infrastructure:			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
Note: Justification is reportable in accordance with condition 13 a) vii). The management plan requirements under condition 8 h) may also indicate that a species or its habitat can co-exist with specific types of gas field infrastructure and operations.	Justification for TEC clearance sighted by the auditors in squad checks (gated internal constraints approvals) for the following linear infrastructure: -CMN153-1 -CMN170-2 -CMN236-2 -CMN280-1 CMN263-3 -CMN281-3 **Compliant.**	The department considers that as the justification is reportable in accordance with condition 13a) vii this constitutes **non-compliance**.	This is a note and it is not considered that this requires a compliance evaluation.

INDEPENDENT AUDIT REPORT ITEMS REQUIRING FURTHER INFORMATION/CLARIFICATION:

APPROVAL CONDITIONS:

Criterion 5l - When siting exploration and production wells:			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
Note: Directional drilling and multiple drill holes from one well pad are options to avoid well site and related infrastructure disturbance to sensitivity category 1-4.	Note this is not mandatory and is for information only. This is not a requirement, hence it will not be audited in terms of compliance and noncompliance.	The Department requires further information/clarification as the audit should have established if these options were employed.	During the audit, wells were in sensitivity categories 5 or higher. Options relevant to categories 1-4 were not investigated as they were not encountered during the audit.
5o. ensure site assessments and field ecological surveys:			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
5o.vi. apply best practice site assessment and ecological survey methods appropriate for each listed threatened species, migratory species, their habitat and listed ecological communities as detailed in the Protocol; Note: Best practice includes applying the optimum timing and frequency of site assessments and surveys to determine presence of listed threatened species or migratory species or their habitat, or a listed threatened ecological community.	Section 7.2 of the Protocol states that field ecology assessments of MNES must comply with SEWPAC survey guidelines and best practice survey methodology. **Compliant.**	The Department requires further information/clarification as to whether this note has been incorporated in the Protocol?	This note has been incorporated into Section 7.6.1 of the Protocol.
Criterion 8 - The management plans required under condition 7 must be developed by a qualified ecologist approved in writing by the Department and as a minimum address the following as relevant to each MNES:			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
8c. known species' populations and their relationships within the region;	The TFMP and TFLMP are structured to reflect condition 8. Each species includes the requirements of 8c. **Compliant.**	The Department requires further information/clarification as to whether the audit comments should also reference the TECMP?	TECMP does not refer to specific species, therefore this condition is not required to be addressed in the TECMP. The requirements of this condition are addressed in the TFMP and TMFLMP.
8i. relevant management practices and methods to minimise impact and recover from impact that should include:			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
8i.i). site rehabilitation timeframes, standards and methods;	This is addressed in Section 1.11 of the TFMP, TFLMP and TECMP. **Compliant.**	The Department requires further information/clarification as to whether the section reference is the same for the TFLMP and TECMP?	This is addressed in Section 1.11 of the TFMP, Section 1.11 of the TFLMP and Section 1.11 of the TECMP.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
8h.vii). monitoring methods including for rehabilitation success and recovery;	This is addressed in Section 1.11 of the TFMP, TFLMP and TECMP. **Compliant.**	The Department requires further information/clarification as to whether the section reference is the same for the TFLMP and TECMP?	This is addressed in Section 1.11 of the TFMP, Section 1.11 of the TFLMP and Section 1.11 of the TECMP.
Criterion 10 – split - The proponent must establish a program for routine review of the species and ecological community management plans to be undertaken by a qualified ecologist approved by the Department (with other experts as appropriate)			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
10.1 The proponent must establish a program for routine review of the species and ecological community management plans to be undertaken by a qualified ecologist approved by the Department (with other experts as appropriate)	Section 1.4 of the TFMP, TFLMP, and TECMP states that the plan applies to each of the gas field development stages and will be reviewed every five years in alignment with the design of the five year staging for the gas field development. The five year review will be undertaken earlier if the staging timeframe is shortened or if new studies, management plans, or legislation come into effect that may be relevant.	The Department requires further information/clarification as to whether the section reference is the same for the TFLMP and TECMP? Further, the Department requires further information/clarification as to when the five year timeframe for review of the plan(s) will be triggered?	Section 1.4 of the TFMP, Section 1.4 of the TFLMP, and Section 1.4 of the TECMP states that the plan applies to each of the gas field development stages and will be reviewed every five years in alignment with the design of the five year staging for the gas field development. The five year review will be undertaken earlier if the staging timeframe is shortened or if new studies, management plans, or legislation come into effect that may be relevant. The five year review time frame had not passed at time of the audit. Five year review would occur in March 2017, or at commencement of next project stage.
Table 2 - Disturbance limits for listed threatened ecological communities			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
Brigalow *(Acacia harpophylla dominant and codominant)*	**Compliant.**	In relation to disturbance limits the Department requires further information/clarification as the audit report must provide commentary on the nature of the records reviewed, that date of interrogation of those records, and details of the actual extent of disturbance to support the findings.	TEC disturbance spreadsheet sighted, including GIS register and related figures. Sighted by auditors 4 February 2015. Actual disturbance at time of audit = 46.4 ha
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
Weeping Myall Woodland	**Compliant.**	In relation to disturbance limits the Department requires further information/clarification as the audit report must provide commentary on the nature of the records reviewed, that date of interrogation of those records, and details of the actual extent of disturbance to support the findings.	TEC disturbance spreadsheet sighted, including GIS register and related figures. Sighted by auditors 4 February 2015. Actual disturbance at time of audit = 0 ha

Criteria:	Finding:	Department's Response:	Auditors' Response:
The community of native species dependent on natural discharge of groundwater from the Great Artesian Basin	**Compliant.**	In relation to disturbance limits the Department requires further information/clarification as the audit report must provide commentary on the nature of the records reviewed, that date of interrogation of those records, and details of the actual extent of disturbance to support the findings.	TEC disturbance spreadsheet sighted, including GIS register and related figures. Sighted by auditors 4 February 2015. Actual disturbance at time of audit = 0 ha
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
Semi-evergreen vine thickets of the Brigalow Belt (North and South) and Nandewar Bioregions	**Compliant.**	In relation to disturbance limits the Department requires further information/clarification as the audit report must provide commentary on the nature of the records reviewed, that date of interrogation of those records, and details of the actual extent of disturbance to support the findings.	TEC disturbance spreadsheet sighted, including GIS register and related figures. Sighted by auditors 4 February 2015. Actual disturbance at time of audit = 1.2 ha
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
Natural Grasslands of the Queensland Central Highlands and the northern Fitzroy Basin	**Compliant.**	In relation to disturbance limits the Department requires further information/clarification as the audit report must provide commentary on the nature of the records reviewed, that date of interrogation of those records, and details of the actual extent of disturbance to support the findings.	TEC disturbance spreadsheet sighted, including GIS register and related figures. Sighted by auditors 4 February 2015. Actual disturbance at time of audit = 0 ha
Criterion 26 - Impact on Narran lakes - The Gasfield activities must not have a significant impact on the Narran Lakes Wetlands.			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
Impact on Narran lakes - The Gasfield activities must not have a significant impact on the Narran Lakes Wetlands.	Section 6.2 of the CWMMP states that "concluded that it would be unlikely for treated CSG water to be transmitted to an extent that it could affect Narran Lakes. This was further confirmed with additional modelling completed by RPS in 2012. Appendix C - RPS (ex Conics) Assessment of Impact on Narran Lakes Wetland. Since there is no potential to impact on MNES associated with Narran Lakes, it is not considered necessary to develop threshold values." A letter from RPS to Origin Energy states that "there is likely to be minimal (if any) flow of CSG water from the APLNG project (and hence no impact) into Narran Lakes and certainly not Gwydir Wetlands." **Compliant.**	The Department requires further information/clarification as to commitments were actually measured from an implementation perspective to demonstrate compliance? Was a site inspection conducted to establish that gas field activities have not had a significant impact on the Narran Lakes Wetlands?	Section 6.2 of the CWMMP states that "concluded that it would be unlikely for treated CSG water to be transmitted to an extent that it could affect Narran Lakes. This was further confirmed with additional modelling completed by RPS in 2012. Appendix C - RPS (ex Conics) Assessment of Impact on Narran Lakes Wetland. Since there is no potential to impact on MNES associated with Narran Lakes, it is not considered necessary to develop threshold values." A letter from RPS to Origin Energy states that "there is likely to be minimal (if any) flow of CSG water from the APLNG project (and hence no impact) into Narran Lakes and certainly not Gwydir Wetlands." No site inspection of Narran Lakes was conducted. The RPS report provided as part of the CWWMP states that there is "no potential to impact on MNES associated with Narran Lakes". A letter was provided by RPS to Australia Pacific LNG to further substantiate this. It is considered that this is sufficient evidence that no significant impact is occuring.

IMPLEMENTATION OF THE ENVIRONMENTAL CONSTRAINTS PLANNING AND FIELD DEVELOPMENT PROTOCOL

EPBC Approval Condition 5. The Protocol must:			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
c. require pre-clearance site assessments of sensitivity category 1-4 by an approved suitably qualified ecologist;	Four preclearance surveys were sighted: -Griffin BC pressure zones 1A-3 (Ausecology) -Potters Flat (Boobook) -Crosby Property (New Ground) -Keys Property (AMEC) It is not clear from these pre-clearance surveys whether the sites are located in sensitivity categories 1-4. It was unclear if Ausecology, or their ecologists are approved. It is also unclear if Griffin BC pressure zones 1A-3 include sensitivity categories 1-4, and therefore many not require an approved ecologist. Boobook received company approval to undertake pre-clearance surveys on 28 June 2011. The Crosby property survey does not state specific ecologists. Noted that approval for nine New Ground ecologists has been sighted from 18 February 2013. This approval is dated after submission of the survey report as Revision 0 on 12 February 2013. Dan Rollison signed off the report and has previously been approved by the Department on 11 May 2011. An ecology assessment report refers to New Ground approved to undertake ecological surveys by DSEWPaC on the 28/06/2011, however evidence of this approval was not provided during the audit. AMEC ecologists, James Gubby and Trevor Meers, approved for terrestrial flora and terrestrial fauna respecitively, on 31 July 2012. **Undetermined.**	The Department requires further information/clarification as a representative sample of site assessments for sensitivity category 1 - 4 should have been identified and selected for review.	Four preclearance surveys were sampled and sighted: -Griffin BC pressure zones 1A-3 (New Ground) -Potters Flat (Boobook) -Crosby Property (New Ground) -Keys Property (AMEC) It was not clear from these pre-clearance surveys whether the sites are located in sensitivity categories 1-4 which makes identification of a representative sample difficult. The sample size was determined in line with the approach to identification of locations for the site visit. As approved ecologists were used in all cases that were audited, this improved the auditors confidence that this condition was complied with. Griffin BC: New Ground received company approval to undertake pre-clearance surveys on 28 June 2011 Potters Flat: Boobook received company approval to undertake pre-clearance surveys on 28 June 2011. Approval for Crosby Property New Ground ecologists sighted in 2 letters from the Department (10 December 2012 and 18 February 2013) Keys Property: AMEC ecologists, James Gubby and Trevor Meers, approved for terrestrial flora and terrestrial fauna respecitively, on 31 July 2012.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
d. require pre-clearance site assessments of sensitivity category 5-7 by a suitably qualified environmental officer;	**Undetermined.**	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. A representative sample of site assessments for sensitivity category 5 - 7 should have been identified and selected for review.	Four preclearance surveys were sighted: -Griffin BC pressure zones 1A-3 (New Ground) -Potters Flat (Boobook) -Crosby Property (New Ground) -Keys Property (AMEC) In all cases, approved ecologists were used to carry out the pre-clearance assessments (see response to condisiton 5c) and are therefore considerd to be suitable qualified.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
e. for any MNES identified following an assessment under 5d, require review of those pre-clearance site assessments by a suitably qualified ecologist;	**Undetermined.**	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. A representative sample of site assessments for sensitivity category 5 - 7 should have been identified and selected for review to determine if any MNES were identified that then required the pre-clearance sites assessments to be reviewed by a qualified ecologist.	Due to the diffence in land classification between the EIS (BAAM mapping) and the land classification approach taken in the ECA process, it is difficult to align specific categories from the EPBC approval with those found during the preclearance process. However, following the assessment carried out under condition 5d, no evidence was sighted during the audit to determine if any MNES were identified that then required review of the pre-clearance site assessments. All preclearance assessments sighted were carried out by approved ecologists and considered to be suitably qualified.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
f. update constraints mapping with results of any pre clearance site assessments which confirm presence of MNES	Following discussion with Australia Pacific LNG and review of pre-clearance assessment methodology, the auditors understand that results of preclearance site assessments (including GIS data recorded using a trimble in the field) is provided to update constraints mapping prior to design finalisation. See audit report for detail on this process. **Compliant.**	The Department requires further information/clarification as to what actual documentation was reviewed to confirm that the requirement to: 'update constraints mapping with the results of any pre-clearance site assessments which confirm the presence on MNES' was implemented.	Following discussion with Australia Pacific LNG and review of pre-clearance assessment methodology, the auditors understand that results of pre-clearance site assessments (including GIS data recorded using a trimble in the field) is provided to update constraints mapping prior to design finalisation. See audit report for detail on this process. During the audit, documentation, inlcuding pre-clearance surveys, ecology assessments and environmental constraints assessments, was reviewed. Each document referenced the previous assessment as a source, indicating that new information is used to update existing constraints mapping.

Criteria:	Finding:	Department's Response:	Auditors' Response:
g. require the documentation of all planning decisions and pre-clearance site assessments and field ecological surveys in proposed gas fields development areas where sensitivity category 1-4 is mapped, likely or found;	Planning decisions for infrastructure placement are recorded in Environmental Constraints Assessments (ECAs). ECAs for the following locations were sighted: -Gathering - Combabula, Golden, R -Gathering - Combabula, Griffin BC Zone 1A-2 -Gathering - Combabula, Griffin BC Zone 0A-4 -Gas Processing Facility - Combabula Pre-clearance assessments are documented separately, with the results used in planning decisions. **Compliant.**	The Department requires further information/clarification to confirm that the Environmental Constraints Assessments that were reviewed were in relation to sensitivity category 1 - 4.	Planning decisions for infrastructure placement are recorded in Environmental Constraints Assessments (ECAs). Each ECA lists the sensitivity categories identified on site. ECAs for the following locations were sighted: -Gathering - Combabula, Golden, R (this contains sensitivity categories 1 and 4) -Gathering - Combabula, Griffin BC Zone 1A-2 (this contains sensitivity categories 1-4) -Gathering - Combabula, Griffin BC Zone 0A-4 -Gas Processing Facility - Combabula Pre-clearance assessments are documented separately, with the results used in planning decisions.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
k. require the pre-clearance site assessments and field ecological surveys to identify and assess options relating to development impacts on MNES and provide recommendations to inform the development of the project area;	Pre-clearance surveys sighted each include a recommendations sections with relation to MNES flora and fauna management. **Compliant.**	The Department requires further information/clarification to confirm that the pre-clearance site assessments are used to: 'identify and assess options relating to development impacts on MNES provide recommendations to inform the development of the project area'.	Pre-clearance surveys sighted each include a recommendations sections with relation to MNES flora and fauna management. The results of pre-clearance surveys are included in constraints mapping as per condition 5f, to inform development decisions.
Note: The proponent's approach to sensitivity mapping relates to impact avoidance and mitigation as described in volume 2, chapter 23 of the proponent's Environmental Impact Statement (publicly released 20 march 2010). The indicative sensitivity categories described in the EIS are:			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
Category 1: Extremely sensitive: Siting of infrastructure within these areas will be avoided.	BAAM sensitivity category mapping used in the EIS is ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase). **Compliant.**	The Department requires further information/clarification as the audit comments do not specifically address the requirement of: 'Siting of infrastructure within these areas will be avoided.' Based on the audit comments Categories 2, 3, 6 and 7 were not measured and at best should result in some **undetermined** findings.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No infrastructure (wells, linear or non-linear) was identified in category 1 during the audit, through either documentation review or site inspection.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
Category 2: Highly Sensitive: Infrastructure will only be located within or in proximity to existing cleared and disturbed areas to reduce fragmentation; Limited clearing (if necessary for incremental expansion of existing disturbance) for construction to be rehabilitated prior to operation.	**Compliant.**	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: ' Infrastructure will only be located within or in proximity to existing cleared and disturbed areas to reduce fragmentation; Limited clearing (if necessary for incremental expansion of existing disturbance) for construction to be rehabilitated prior to operation'. Based on the audit comments Categories 2, 3, 6 and 7 were not measured and at best should result in some **undetermined** findings.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No infrastructure (wells, linear or non-linear) was identified in category 2 during the audit, through either documentation review or site inspection.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
Category 3: Sensitive: Clearing only for linear infrastructure and well leases. Non-linear infrastructure to be located within or in proximity to existing cleared and disturbed areas. Disturbed areas not required for ongoing operation to be rehabilitated prior to operation.	**Compliant.**	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'Clearing only for linear infrastructure and well leases. Non-linear infrastructure to be located within or in proximity to existing cleared and disturbed areas. Disturbed areas not required for ongoing operation to be rehabilitated prior to operation.' Based on the audit comments Categories 2, 3, 6 and 7 were not measured and at best should result in some **undetermined** findings.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No infrastructure (linear or non-linear) was identified in category 3 during the audit, through either documentation review or site inspection. BAAM mapping for the 2A work pack indicates wells sited category 3. During the site audit, well CMN280 (MD, HD Golden and ML Wathen) was identified in sensitivity category 3. Justification (squad check) for placement of this well within category 3 sighted by auditors (required due to large spacing, with well placed at best point for least impact construction).

Criteria:	Finding:	Department's Response::	Proponent's Response
Category 4: Neutral: Clearing for linear and non-linear infrastructure is to minimise edge effects where possible.	**Compliant.**	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'Clearing for linear and non-linear infrastructure is to minimise edge effects where possible'. Based on the audit comments Categories 2, 3, 6 and 7 were not measured and at best should result in some **undetermined** findings.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No non-linear infrastructure was identified in category 2-4 during the audit, through either document review or site inspection. The site visit conducted identified linear infrastructure (gathering network) within sensitivity category 4 and 5 (RG Golden, Sustain Phase). Edge effects were not assessed during the audit.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
Category 5: Robust: Clearing for infrastructure, although hollow-bearing trees and habitat connectivity, particularly along watercourses, to be retained.	**Compliant.**	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'Cleared: Siting of infrastructure >100m from edges of categories 2-5 and >200m from category 1'. Based on the audit comments Categories 2, 3, 6 and 7 were not measured and at best should result in some **undetermined** findings.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. BAAM mapping for the 2A work pack indicates wells sited in the buffer around category 1, and within categories 3 and 5. BAAM mapping for the Griffin BC work pack indicates wells sited in in category 5 only. BAAM mapping for the RG Golden work pack indicates wells sited in the buffer around categories 2 to 5, and within category 5. During the site audit, well CMN237 was identified within the Category 2-5 buffer. The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase).
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
Category 6 and 7: Cleared: Siting of infrastructure >100m from edges of categories 2-5 and >200m from category 1.	**Compliant.**	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'Siting of infrastructure >100m from edges of categories 2-5 and >200m from category 1.' Based on the audit comments Categories 2, 3, 6 and 7 were not measured and at best should result in some **undetermined** findings.	BAAM mapping provided to auditors does not identify categories 6 and 7. Thus no observations were made regarding these categories.
l. to avoid direct and indirect adverse impacts on MNES, including fragmentation and edge effects, provide that proposed infrastructure is located in accordance with the following: When siting exploration and production wells:			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
i) avoid development within sensitivity category 1 unless authorised in writing by the Department;	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. BAAM mapping for the 2A work pack indicates wells sited in the buffer around category 1. BAAM mapping for the Griffin BC work pack indicates wells sited in in category 5 only. BAAM mapping for the RG Golden work pack indicates wells sited in the buffer around categories 2 to 5, and within category 5. **Compliant.**	The Department requires further information/clarification as the audit comments do not specifically address the requirement: 'avoid development within sensitivity category 1 unless authorised in writing by the Department'. The verification method also indicates that compliance would be measured through a combination of document review and a site inspection however there is no specific commentary in relation to a site inspection.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No wells were identified within category 1 during the audit through document review or during the site inspection.

Criteria:	Finding:	Department's Response:	Auditors' Response:
ii) avoid development within sensitivity category 2-4, unless the location within any of these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable;	**Compliant.**	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement to: 'avoid development within sensitivity category 2-4, unless the location within any of these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable'. The verification method also indicates that compliance would be measured through a combination of document review and a site inspection however there is no specific commentary in relation to a site inspection.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. BAAM mapping for the 2A work pack indicates wells sited in the buffer around category 1, and within categories 3 and 5. During the site audit, well CMN280 (MD, HD Golden and ML Wathen) was identified in sensitivity category 3. Justification (squad check) for placement of this well within category 3 sighted by auditors (required due to large spacing, with well placed at best point for least impact construction).
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
iii) where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site the wells in proximity to cleared areas, or in areas of lower ecological condition such as previously disturbed or degraded areas; and	**Compliant.**	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site the wells in proximity to cleared areas, or in areas of lower ecological condition such as previously disturbed or degraded areas'. The verification method also indicates that compliance would be measured through a combination of document review and a site inspection however there is no specific commentary in relation to a site inspection.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. BAAM mapping for the 2A work pack indicates wells sited in the buffer around category 1, and within categories 3 and 5. During the site audit, well CMN280 (MD, HD Golden and ML Wathen) was identified in sensitivity category 3. Justification (squad check) for placement of this well within category 3 sighted by auditors (required due to large spacing, with well placed at best point for least impact construction).
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
iv) where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist	**Compliant.**	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist'. The verification method also indicates that compliance would be measured through a combination of document review and a site inspection however there is no specific commentary in relation to a site inspection.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. BAAM mapping for the 2A work pack indicates wells sited in the buffer around category 1, and within categories 3 and 5. During the site audit, well CMN280 (MD, HD Golden and ML Wathen) was identified in sensitivity category 3. Justification (squad check) for placement of this well within category 3 sighted by auditors (required due to large spacing, with well placed at best point for least impact construction). BAAM mapping for the Griffin BC work pack indicates wells sited in in category 5 only. BAAM mapping for the RG Golden work pack indicates wells sited in the buffer around categories 2 to 5, and within category 5. During the site audit, well CMN237 was identified within the Category 2-5 buffer.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
Note: Directional drilling and multiple drill holes from one well pad are options to avoid well site and related infrastructure disturbance to sensitivity category 1-4.		The Department requires further information/clarification as the audit should have established if these options were employed.	During the audit, wells were in sensitivity categories 5 or higher. Options relevant to categories 1-4 were not investigated as they were not encountered during the audit.

When siting non-linear infrastructure:			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
i) avoid development within sensitivity category 1 unless authorised in writing by the Department;	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. Work packs reviewed for Combabula GPF, Reedy Creek GPF and Reedy Creek WTF. Combabula GPF located in Category 5, and Category 2-5 buffer. Reedy Creek GPF located primarily in cleared area, with an overlap with Category 2-5 buffer. Reedy Creek WTF located within cleared area and does not overlap with any sensitivity categories. **Compliant.**	The Department requires further information/clarification as the audit comments do not specifically address the requirement to: 'avoid development within sensitivity category 1 unless authorised in writing by the Department'. Based on the audit comments Category 1 was not measured and at best should result in an **undetermined** finding. The verification method also indicates that compliance would be measured through a combination of document review and a site inspection however there is no specific commentary in relation to a site inspection.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No non-linear infrastructure was identified in category 1 during the audit, through either document review or site inspection Work packs reviewed for Combabula GPF, Reedy Creek GPF and Reedy Creek WTF. Combabula GPF located in Category 5, and Category 2-5 buffer. Reedy Creek GPF located primarily in cleared area, with an overlap with Category 2-5 buffer. Reedy Creek WTF located within cleared area and does not overlap with any sensitivity categories.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
ii) avoid development within sensitivity category 2-4, unless the location within any of these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable;	**Compliant.**	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement to: 'avoid development within sensitivity category 2-4, unless the location within any of these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable'. The verification method also indicates that compliance would be measured through a combination of document review and a site inspection however there is no specific commentary in relation to a site inspection.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No non-linear infrastructure was identified in category 2-4 during the audit, through either document review or site inspection Work packs reviewed for Combabula GPF, Reedy Creek GPF and Reedy Creek WTF. Combabula GPF located in Category 5, and Category 2-5 buffer. Reedy Creek GPF located primarily in cleared area, with an overlap with Category 2-5 buffer. Reedy Creek WTF located within cleared area and does not overlap with any sensitivity categories.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
iii) where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site infrastructure in or approximate to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas; and	**Compliant.**	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site infrastructure in or approximate to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas'. The verification method also indicates that compliance would be measured through a combination of document review and a site inspection however there is no specific commentary in relation to a site inspection.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No non-linear infrastructure was identified in category 2-4 during the audit, through either document review or site inspection Work packs reviewed for Combabula GPF, Reedy Creek GPF and Reedy Creek WTF. Combabula GPF located in Category 5, and Category 2-5 buffer. Reedy Creek GPF located primarily in cleared area, with an overlap with Category 2-5 buffer. Reedy Creek WTF located within cleared area and does not overlap with any sensitivity categories.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
iv) where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist.	**Compliant.**	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist'. The verification method also indicates that compliance would be measured through a combination of document review and a site inspection however there is no specific commentary in relation to a site inspection.	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No non-linear infrastructure was identified in category 2-4 during the audit, through either document review or site inspection Work packs reviewed for Combabula GPF, Reedy Creek GPF and Reedy Creek WTF. Combabula GPF located in Category 5, and Category 2-5 buffer. Reedy Creek GPF located primarily in cleared area, with an overlap with Category 2-5 buffer.

			Reedy Creek WTF located within cleared area and does not overlap with any sensitivity categories.

When siting linear infrastructure:			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
i) avoid development within sensitivity category 1 unless authorised in writing by the Department;	BAAM sensitivity category mapping used in the EIS is ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase). **Compliant.**	The Department requires further information/clarification as the audit comments do not specifically address the requirement to: 'avoid development within sensitivity category 1 unless authorised in writing by the Department'. Based on the audit comments Categories 2 and 3 were not measured and at best should result in some **undetermined** findings.	BAAM sensitivity category mapping used in the EIS is ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No linear infrastructure was identified in category 1 during the audit, through document review or site inspection The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase).
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
ii) avoid development within sensitivity category 2-4, unless their location within these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable;	**Compliant.**	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement to: 'avoid development within sensitivity category 2-4, unless their location within these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable'. Based on the audit comments Categories 2 and 3 were not measured and at best should result in some **undetermined** findings.	BAAM sensitivity category mapping used in the EIS is ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No linear infrastructure was identified in category 2 or 3 during the audit, through document review or site inspection The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase). Justification for the location of flowline CMN116-1 through sensitivity category 4 is provided in the environmental constraints assessment (The flowline location complies as it is predominantly located within pre-existing disturbed/cleared land.)
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
iii) where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site infrastructure in or approximate to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas; and	**Compliant.**	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site infrastructure in or approximate to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas' Based on the audit comments Categories 2 and 3 were not measured and at best should result in some **undetermined** findings.	BAAM sensitivity category mapping used in the EIS is ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No linear infrastructure was identified in category 2 or 3 during the audit, through document review or site inspection The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase). Justification for the location of flowline CMN116-1 through sensitivity category 4 is provided in the environmental constraints assessment (The flowline location complies as it is predominantly located within pre-existing disturbed/cleared land.)
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
iv) where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist.	**Compliant.**	The Department requires further information/clarification as this item is to be separately measured and assigned a compliance finding in the audit report. The audit report appears to rely upon the information provided above. The audit comments do not specifically address the requirement that: 'where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist.' Based on the audit comments Categories 2 and 3 were not measured and at best should result in some **undetermined** findings.	BAAM sensitivity category mapping used in the EIS is ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. No linear infrastructure was identified in category 2 or 3 during the audit, through document review or site inspection The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase). Justification for the location of flowline CMN116-1 through sensitivity category 4 is provided in the environmental constraints assessment (The flowline location complies as it is predominantly located within pre-existing disturbed/cleared land.)

m. require the proponent to plan for and decide the extent that proposed linear infrastructure may have adverse impacts on MNES in accordance with the following:			
i. all linear disturbance within environmental sensitivity category 1-4 for MNES and the impact risk zone must be:			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
I. limited to 12 metres in width for a single flow line;	Auditors advised that the approved alignment widths are incorporated into design, with the Origin environmental advisor undertaking a final check of alignment widths prior to issue to Principal Contractor. Leighton (Combabula gathering network PC) advised during the site visit that alignment widths are reduced below the approved width where possible, provided that safety on the right of way is not compromised. Alignment sheets were requested during the audit, however were not able to be provided. **Compliant.**	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
II. limited to 18 metres in width for trenches with one water gathering line and one parallel gas gathering line;	**Compliant.**	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit. The following incident was identified in the compliance register: In February 2013 a Contractor was clearing and mulching right of ways for installation of gathering network on the Nullin property. ROW COM284-1 consists of a single water pipeline and gas pipeline and is within the 200m Primary Protection Zone of a Category C Environmentally Sensitive Area (Combabula State Forest). This ROW configuration (single gas and water pipe) is limited to 18m within the PPZ of a Category C ESA. Due to a missing survey peg, ROW COM284-1 was cleared to a width greater than this (approx 25m) and tapered back into 18m over a distance of ~60m.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
III. limited to 25 metres in width for multiple trenches where there are three parallel gas or water gathering lines or a single large diameter water pipeline (500mm or above);	**Compliant.**	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
IV. limited to 30 metres for high pressure gas pipeline less than 750mm diameter;	**Compliant.**	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit.

Criteria:	Finding:	Department's Response:	Auditors' Response:
V. limited to 40 metres for high pressure gas pipeline equal to or greater than 750mm diameter;	**Compliant.**	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
VI. limited to an additional 7 metres for each additional trench for water or gas lines.	**Compliant.**	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
VII. limited to an additional 10 metres for each additional high pressure gas pipeline or large diameter water pipeline (500mm or above);	**Compliant.**	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
VIII. limited to disturbance within identified infrastructure corridors;	**Compliant.**	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
IX. where feasible, trenches, pipelines for associated water and other transmissions lines must be co-located to reduce total disturbance on MNES;	**Compliant.**	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit.

Criteria:	Finding:	Department's Response:	Auditors' Response:
X. co-location will not be implemented where an assessment has determined that it is likely to increase impacts on MNES; and	**Compliant.**	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Alignment sheets and corridor width from the gathering network in RG Golden and 2A properities were provided to the auditors. These were the properties visited during the site inspection. The auditors reviewed the documentation against BAAM mapping in the environmental work packs and found them to be consistent with this requirement. No verification was undertaken during site visit.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
Note 1: These widths include provision for a utility corridor and access track.	**Compliant.**	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	This is a note and does not require an evaluation
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
ii. In limited circumstances only (e.g. river crossings, where there are abnormal access constraints into a gas processing facility and when within close proximity to other proponent's linear infrastructure), increased corridor widths within areas of MNES may be required. In those circumstances a risk based site assessment will be completed to determine disturbance to MNES, identify management measures to minimise impacts to MNES and to justify the additional disturbance to MNES. The assessment will be available to the Department prior to any disturbance.	**Compliant.**	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	Auditors advised that gathering construction to date has not increased a corridor in MNES. Where this may have happened in design phase it would be captured in the environmental constraints assessment. The assessments provided did not discuss increased corridor width and it is undetermined if there was a requirement as per this condition.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
Note: any disturbance referred to in this condition would be subtracted from the disturbance limits specified elsewhere in these conditions.	**Compliant.**	The Department requires further information/clarification as the audit comments rely solely on representations made by Origin Energy and their contractor representatives. Further, documentation should have been made available to the auditors for review. The verification method requires compliance to be measured through a combination of document review and site inspection and this has not occurred. These items are to be separately measured and assigned compliance findings in the audit report.	This is a note and does not require an evaluation
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
n. support bioregional corridors for listed threatened species and migratory species, and connectivity for listed threatened ecological communities;	Bioregional corridors (regional and state) are mapped and groundtruthed. Bioregional corridor mapping is included with the standard environmental map suite of workpacks **Compliant.**	The Department requires further information/clarification as the verification method is a combination of document review and site inspection. Was this requirement evidenced as having been met through site inspection?	Bioregional corridors (regional and state) are mapped and groundtruthed. Bioregional corridor mapping is included with the standard environmental map suite of workpacks. Bioregional corridors were not identified during the site audit.

o. ensure site assessments and field ecological surveys:			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
iii. are undertaken by a suitably qualified ecologist approved by the Department for sensitivity categories 1-4;	Refer to condition 5.c) It is not clear which sensitivity category the preclearance surveys have been conducted in. Therefore, it was not able to be determined if an approved ecologist was required to undertake the survey. **Undetermined.**	The Department requires further information/clarification as a representative sample of site assessments for sensitivity category 1 - 4 should have been identified and selected for review. These items are to be separately measured and assigned compliance findings in the audit report.	Four preclearance surveys were sampled and sighted: -Griffin BC pressure zones 1A-3 (New Ground) -Potters Flat (Boobook) -Crosby Property (New Ground) -Keys Property (AMEC) It was not clear from these pre-clearance surveys whether the sites are located in sensitivity categories 1-4 which makes identification of a representative sample difficult. The sample size was determined in line with the approach to identification of locations for the site visit. As approved ecologists were used in all cases that were audited, this improved the auditors confidence that this condition was complied with. Griffin BC: New Ground received company approval to undertake pre-clearance surveys on 28 June 2011 Potters Flat: Boobook received company approval to undertake pre-clearance surveys on 28 June 2011. Approval for Crosby Property New Ground ecologists sighted in 2 letters from the Department (10 December 2012 and 18 February 2013) Keys Property: AMEC ecologists, James Gubby and Trevor Meers, approved for terrestrial flora and terrestrial fauna respecitively, on 31 July 2012.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
iv. are undertaken by a suitably qualified environment officer for sensitivity categories 5-7;	**Undetermined.**	The Department requires further information/clarification as a representative sample of site assessments for sensitivity category 5 - 7 should have been identified and selected for review. These items are to be separately measured and assigned compliance findings in the audit report.	Four preclearance surveys were sighted: -Griffin BC pressure zones 1A-3 (New Ground) -Potters Flat (Boobook) -Crosby Property (New Ground) -Keys Property (AMEC) In all cases, approved ecologists were used to carry out the pre-clearance assessments (see response to condisiton 5c) and are therefore considerd to be suitably qualified.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
vii. apply the mapping of environmental constraints class sensitivity category 1-4; the infrastructure location requirements; minimum no impact zones; impact risk zones; and the width requirements for linear infrastructure corridors described in (m);	The ecology assessment reports and pre-clearance reports provide ground truthed environmental information, which is required to update the data identified in desktop assessment. The application of constraints and sensitivity reports is conducted separately. **Compliant.**	The Department requires further information/clarification to confirm that the requirement to: 'apply the mapping of environmental constraints class sensitivity category 1-4; the infrastructure location requirements; minimum no impact zones; impact risk zones; and the width requirements for linear infrastructure corridors described in (m)' has been implemented.	The preliminary design/alignment of infrastructure involves a desktop assessment taking into account the requirements of the Protocol. These requirements include, but are not limited to, environmentally sensitive areas, BAAM sensitivity mapping, bioregional corridors, watercourses, and soils. The preliminary design is then field scouted to identify potential environmental constraints not previously identified in the desktop assessment. This includes ground-truthing mapped environmental constraints for accuracy (pre-clearance field ecological assessment). The design is refined based on ground-truthed environmental constraints (i.e. avoidance of MNES), with planning decisions documented in an Environmental Constraints Assessment. Where impacts to MNES are unavoidable in the final design, the justification for disturbance has previously been recorded in Squad Checks. Key environmental values and management requirements of the final design are provided as an Environmental Workpack. The workpack is accompanied by a hold point list which requires sign off by field personnel at various stages of development to ensure activities do not proceed without the necessary approvals.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
q. ensure constraints planning and field development decisions are made in accordance with the Protocol (including any relevant species and ecological community management plans) before final selection of specific sites for gas field development within the project area.	Squad checks sighted for the following infrastructure: -CMN153-1 -CMN170-2 -CMN236-2 -CMN280-1 -CMN263-3 -CMN281-3 -CMN153 -CMN194 -CMN255	The Department requires further information/clarification to confirm that the requirement to: 'ensure constraints planning and field development decisions are made in accordance with the Protocol (including any relevant species and ecological community management plans) before final selection of specific sits for gas field development within the project area' has been implemented.	The preliminary design/alignment of infrastructure involves a desktop assessment taking into account the requirements of the Protocol. These requirements include, but are not limited to, environmentally sensitive areas, BAAM sensitivity mapping, bioregional corridors, watercourses, and soils. The preliminary design is then field scouted to identify potential environmental constraints not previously identified in the desktop assessment. This includes ground-truthing mapped environmental constraints for accuracy (pre-clearance field ecological assessment). The design is refined based on ground-truthed

	-CMN280 **Compliant.**		environmental constraints (i.e. avoidance of MNES), with planning decisions documented in an Environmental Constraints Assessment. Where impacts to MNES are unavoidable in the final design, the justification for disturbance has previously been recorded in Squad Checks. Key environmental values and management requirements of the final design are provided as an Environmental Workpack. The workpack is accompanied by a hold point list which requires sign off by field personnel at various stages of development to ensure activities do not proceed without the necessary approvals.

IMPLEMENTATION OF THE SIGNIFICANT SPECIES MANAGEMENT PLANS

EPBC Approval Condition 8 - The management plans required under condition 7 must be developed by a qualified ecologist approved in writing by the Department and as a minimum address the following as is relevant to each MNES:			
i. relevant management practices and methods to minimise impact and recover from impact that should include:			
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
i. site rehabilitation timeframes, standards and methods;	Rehabilitation was observed within the gathering, drilling and facilities areas at Combabula. It was noted that timeframes for rehabilitation are often dependent of other factors (e.g. well leases cannot be rehabilitated until gathering infrastructure is installed). **Compliant.**	The Department requires further information/clarification to confirm whether rehabilitation time-frames, standards and methods are prescribed in the management plan(s). If so, we require a more definitive statement that they were implemented.	This is addressed in Section 1.11 of the TFMP, Section 1.11 of the TFLMP and Section 1.11 of the TECMP. Rehabilitation was observed within the gathering, drilling and facilities areas at Combabula. It was noted that timeframes for rehabilitation are often dependent of other factors (e.g. well leases cannot be rehabilitated until gathering infrastructure is installed). Hold points lists require sign off against rehabilitation objectives. No fully completed hold points lists were provided during the audit.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
ii. use of sequential clearing to direct fauna away from an impact zone;	Discussions were held with on site personnel during the site visit. A clearing front for the gathering network (CMN114) was observed and the audit team discussed the process with the Queensland Fauna Consultancy fauna spotter on site. Auditors were advised that 2-3 days prior to clearing, fauna spotters engage in habitat load reduction and tagging of habitat trees. During clearing of the right of way, habitat trees are left overnight. Trees cleared the previous day are checked for fauna prior to mulching. Due to the linear nature of the gathering network, clearing is sequential. A similar process was described for the drilling and completions team (well leases cleared from one direction), and gas processing facility (most clearing is at the edge of vegetation). **Compliant.**	The Department requires further information/clarification to confirm whether this requirement was actually evidenced during the site inspection?	Discussions were held with on site personnel during the site visit. A clearing front for the gathering network (CMN114) was observed and the audit team discussed the process with the Queensland Fauna Consultancy fauna spotter on site. Auditors were advised that 2-3 days prior to clearing, fauna spotters engage in habitat load reduction and tagging of habitat trees. During clearing of the right of way, habitat trees are left overnight. Trees cleared the previous day are checked for fauna prior to mulching. Due to the linear nature of the gathering network, clearing is sequential. The clearing front identified during the site inspection was in a sequential direction adjacent to the access road. A similar process was described for the drilling and completions team (well leases cleared from one direction), and gas processing facility (most clearing is at the edge of vegetation).
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
iv. welfare and safe handling of fauna specimens requiring relocation from impact sites;	No relocation of fauna was observed during the site visit. Fauna registers and spotter reports reviewed for drilling, gathering and facilities teams. Relocations are regularly recorded. **Compliant.**	The Department requires further information/clarification to confirm that: 'welfare and safe handling of fauna specimens requiring relocation from impact sites' was implemented.	The Field Delivery technical instruction Fauna Protection - Clearing details requirements for the implementation of this condition including safe handling and relocation practices of fauna. No relocation of fauna was observed during the site visit. Fauna registers and spotter reports reviewed for drilling, gathering and facilities teams. Relocations are regularly recorded.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
v. handling practices for flora specimens;	No handling of flora specimenswas observed on site. **Not applicable.**	The Department requires further information/clarification to confirm whether there has been a requirement to handle flora specimens? The audit should have established whether this requirement has been triggered.	Auditors advised that this requirement has not been triggered. No handling of flora specimens was observed during the site inspection.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
vi. translocation practices and monitoring for translocation success;	No evidence of translocation and monitoring provided. **Undetermined.**	The Department requires further information/clarification to confirm whether there been a requirement to translocate species and monitor translocation success? The audit should have established whether this requirement has been triggered.	Auditors advised that this requirement has not been triggered.
Criteria:	**Finding:**	**Department's Response:**	**Auditors' Response:**
vii. monitoring methods including for rehabilitation success and recovery;	No records of rehabilitation monitoring provided. Auditors advised that a document relating to translocation is currently being developed. **Undetermined.**	The Department requires further information/clarification to confirm whether there has been a requirement to establish monitoring methods including rehabilitation success and recovery? The audit should have established whether this requirement has been triggered.	Auditors advised that this requirement has not been triggered.

Criteria:	Finding:	Department's Response:	Auditors' Response:
j. surface and ground water quality and quantity requirements, including relevant downstream environmental quality parameters;	A culvert is under construction adjacent to a TEC at the gas processing facility site. Auditors advised that, a check was made of the culvert prior to recent rain, and downstream erosion and sediment control was implemented. This was observed by site personnel to prevent sediment flowing into the TEC. No evidence of watercourse interaction with gathering or drilling was observed during the site visit. Extensive evidence of erosion and sediment control maintenance conducted after a recent rain event was observed during the site audit. **Compliant.**	The Department requires further information/clarification to confirm whether any monitoring/inspection records were reviewed to ground-truth that surface and ground water quality and quantity controls were in place including any parameters measured?	A culvert is under construction adjacent to a TEC at the gas processing facility site. Auditors advised that, a check was made of the culvert prior to recent rain, and downstream erosion and sediment control was implemented. This was observed by site personnel to prevent sediment flowing into the TEC. No evidence of watercourse interaction with gathering or drilling was observed during the site visit. Extensive evidence of erosion and sediment control maintenance conducted after a recent rain event was observed during the site audit. No water quality records reviewed during the audit, and the compliance evaluation is based on the auditors observations during the site inspection.

APPENDIX C AUDIT REPORT REVISION 0, 19 FEBRUARY 2015

URS

Report

Independent Third Party Audit

AUSTRALIA

Environment Protection and Biodiversity Conservation Approval Audit

19 February 2015
42627331/01/0

Prepared for:
Origin Energy

Prepared by URS Australia Pty Ltd

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ABBREVIATIONS

Abbreviation	Description
BAAM	Biodiversity Assessment and Management Pty Ltd
EIS	Environmental Impact Statement
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999*
GPF	Gas Processing Facility
LNG	Liquefied Natural Gas
MDL	Minimum Disturbance Lease
MNES	Matters of National Environmental Significance
RABQSA	Registrar Accreditation Board Quality Society of Australasia
ROW	Right of Way
TEC	Threatened Ecological Community
TECMP	Threatened Ecological Community Management Plan
TFLMP	Threatened Flora Management Plan
TFMP	Threatened Fauna Management Plan

EXECUTIVE SUMMARY

URS Australia Pty Ltd (URS) was commissioned by Origin to undertake an audit of conditions 3 to 13 and 20 to 26 of the Australia Pacific LNG approval under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) for the development of the Walloons gas fields (EPBC 2009/4974). The Department of the Environment requested the audit in accordance with condition 102 of the EPBC approval, to be performed in compliance with conditions 103 to 107.

In accordance with condition 103, the Department of the Environment approved URS as an independent auditor, with the audit criteria approved on 11 December 2014.

The audit sought to review documentation and site implementation where current activities are most relevant to Matters of National Environmental Significance (MNES) in order to meet the audit objective. The Combabula Development Area was targeted as a representative sample of activities across the Walloons gas fields.

Overall, the project was assessed as highly compliant. Few non-compliances were identified; these were primarily associated with minor omissions in documentation or a result of ongoing discussions with the Department (e.g. potential habitat).

On-site personnel were confident and knowledgeable regarding environmental requirements for interaction with MNES.

No evidence of impact to MNES, other than approved disturbance, was identified during the audit, with the action considered to be undertaken in accordance with the approval conditions.

1 INTRODUCTION

1.1 Background

The Australia Pacific LNG Project received Commonwealth environmental approval for the development, construction, operation and decommissioning of the Walloons gas fields within the Surat Basin in south-central Queensland on 21 February 2011 (EPBC 2009/4974). The location of the Walloons gas fields is shown in Figure 1-1.

On 5 February 2014, the Department of the Environment (the Department) directed Origin Energy (Origin), on behalf of Australia Pacific LNG, to undertake an audit of specific conditions of the approval[1]. The Department stated the following objective for this audit:

An audit will verify the effectiveness of these conditions in protecting matters of National Environmental Significance, and whether the action is being undertaken in accordance with the approval conditions.

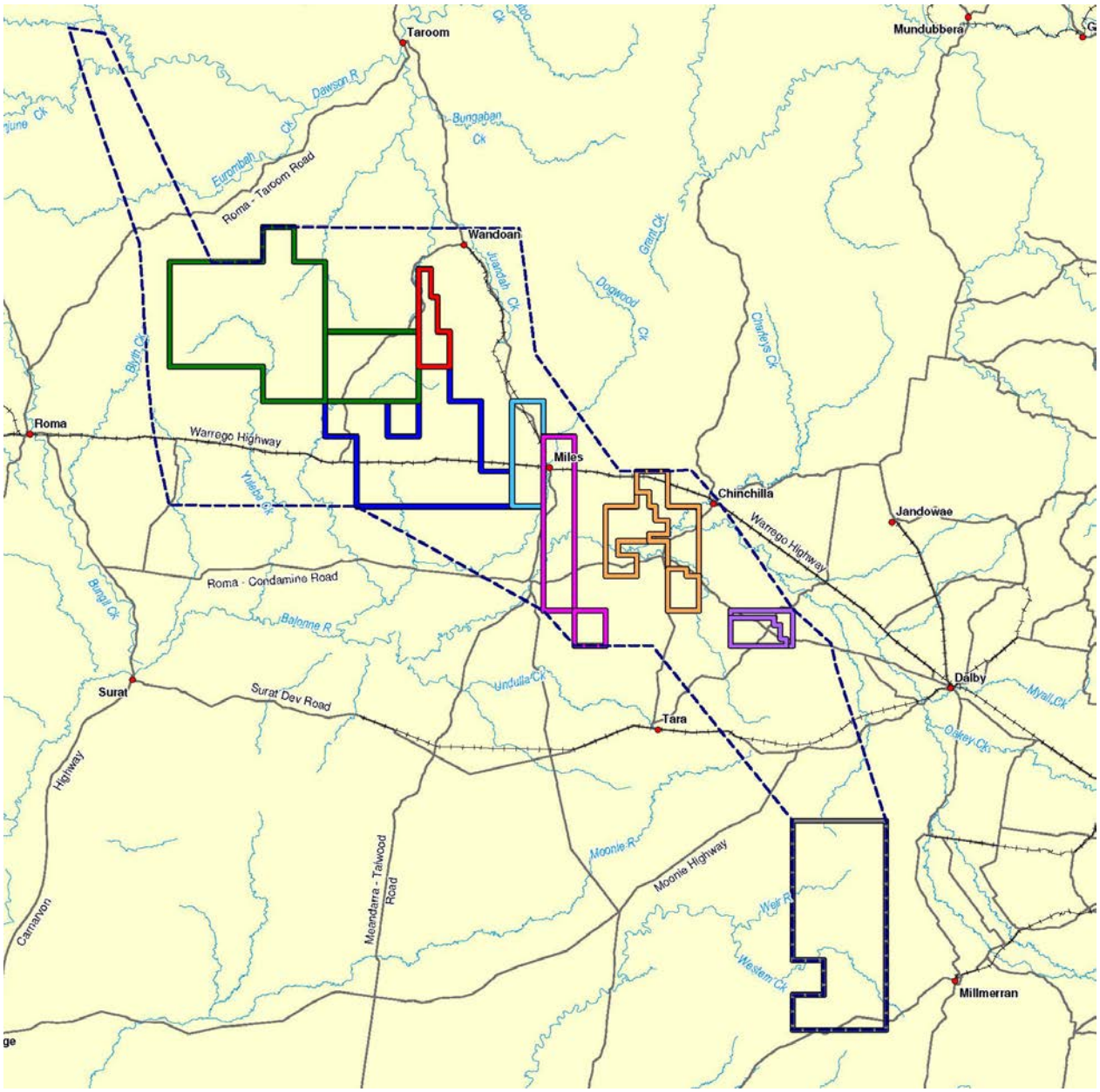
URS Australia Pty Ltd (URS) was commissioned by Origin to undertake this audit, and was subsequently approved by the Department as an independent auditor in accordance with condition 103 of the approval[2]. The URS audit team qualifications and experience are provided in Section 3.1. The audit criteria was approved by the Department on 11 December 2014, in accordance with condition 103 of the approval[3].

1.2 Audit Scope

The Department requested that the audit scope include conditions 3 to 13 and 20 to 26 of EPBC 2009/4974. These conditions primarily address environmental constraints planning documentation and implementation, and species management plans for fauna, flora and threatened ecological communities listed under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

[1] Letter from Shane Gaddes (Assistant Secretary, Compliance and Enforcement Branch, Department of the Environment) to Rob Ully (Environmental Approvals and Strategy Manager, Origin Energy), dated 5 February 2014. Department of the Environment reference: 2013/12231.
[2] Letter from Shane Gaddes to Rob Ully, dated 12 May 2014. Department of the Environment reference: 2014/02846
[3] Letter from Shane Gaddes to Rob Ully dated 11 December 2014, Department of the Environment reference 14/008248

Figure 1-1 Australia Pacific LNG Walloons gas field development areas



2 CONTEXT

2.1 Project overview

Australia Pacific LNG Pty Limited is an incorporated joint venture between Origin Energy Limited (37.5%), ConocoPhillips (37.5%) and Sinopec (25%). The Australia Pacific LNG project includes the development of Australia Pacific LNG's substantial coal seam gas resources in the Surat and Bowen Basins, a 530 km transmission pipeline, and a multi-train liquid natural gas (LNG) facility on Curtis Island, near Gladstone.

Gas Processing Facilities (GPF) construction is now 88% complete with 9 compression trains across 5 gas plants, of which 4 trains are reliably producing into the domestic market on an ongoing basis, all remain on schedule for delivery. The Condabri Central Plant has been the first of the 7 new plants to be commissioned.

First gas to the LNG facility has been achieved and marks the commissioning of the 530 km high pressure gas pipeline, being an important milestone for the project.

Over the life of the phase 1 project, the Drilling and Completions (D&C) team will drill 977 coal seam gas (CSG) development wells.

The Gathering and Development (G&D) team is responsible for the design and construction of low pressure gas and water gathering systems to connect the wells with the gas and water processing facilities; the connection of wellhead separation facilities at the wells and associated infrastructure such as roads, bridges and communications to provide access to the wells and processing facilities.

2.2 Walloons Gas Field Development

The Australia Pacific LNG project includes the Walloon gas fields in the Surat Basin. The Walloons gas fields comprise eight development areas, namely (Figure 1-1):

- Combabula/Ramyard
- Condabri
- Talinga/Orana
- Woleebee
- Kainama
- Gilbert Gully
- Dalwogan
- Carinya

The development in these gas fields is at varying stages, from clearing and construction to rehabilitation and operational facilities. Due to the geographic size and extent of activities across the gas fields, URS sought to review documentation and on-site implementation where current activities are most relevant to MNES. The audit methodology for determining a representative sample is documented in Section 3.

Initially, following discussions with Origin, the Condabri and Combabula development areas were selected for targeted auditing. However, at the time approval of the audit criteria was received, only the Combabula development area was considered as a representative sample of MNES interaction at the time of the site visit.

2.3 Environmental Constraints Planning and Field Development Protocol

In accordance with Condition 5 of the approval, Australia Pacific LNG has developed an Environmental Constraints Planning and Field Development Protocol (the Protocol).

The Protocol describes the process for obtaining internal environmental approval for disturbance activities for the upstream Australia Pacific LNG Project consisting of well head drilling and commissioning, gas field facilities sites, the gathering network and high pressure pipeline, where it lies within the gas fields only. The purpose of the Protocol is to ensure compliance with all relevant Commonwealth environmental approval requirements, EIS commitments and obligations prior to clearing.

The Protocol sets out the method of environmental constraints assessment and environmental construction planning including, namely:

- Desktop assessment;
- Pre-clearance field ecological assessment;
- Pre-construction field environmental scout;
- Targeted ecological survey;
- Application of environmental constraints to infrastructure planning;
- Data collection and storage; and
- Documentation and reporting requirements.

Condition 20 of the approval requires implementation of the Protocol.

2.3.1 Implementation Process

The design and location of gas field infrastructure is controlled through the constraints process, which includes a series of hold points which address a range of requirements, including environmental approvals. This applies across all of the Walloons gas fields and all aspects of the project, including well head drilling and commissioning, gas field facilities sites, the gathering network and high pressure pipeline.

The following describes the implementation of the process with respect to environmental requirements only:

1. The preliminary design/alignment of infrastructure involves a desktop assessment taking into account the requirements of the Protocol (Section 7.1 of the Protocol). These requirements include, but are not limited to, environmentally sensitive areas, Biodiversity Assessment and Management Pty Ltd (BAAM) sensitivity mapping, bioregional corridors, watercourses, and soils.

2. The preliminary design is then field scouted to identify potential environmental constraints not previously identified in the desktop assessment. This includes ground-truthing mapped environmental constraints for accuracy. The requirements of a pre-clearance field ecological assessment are addressed in Section 7.2 of the Protocol.

3. The design is refined based on ground-truthed environmental constraints (i.e. avoidance of MNES), with planning decisions documented in an Environmental Constraints Assessment.

4. Where impacts to MNES are unavoidable in the final design, the justification for disturbance has previously been recorded in Squad Checks. As the project moves into the operations phase, these justifications are documented in Threatened Ecological Community (TEC) drawdown records.

5. Key environmental values and management requirements of the final infrastructure design are provided to the Principal Contractor as an Environmental Workpack. The workpack is accompanied by a hold point list which requires sign off by field personnel at various stages of development to ensure activities do not proceed without the necessary approvals. These hold points include external approvals, pre-construction, site establishment, construction and workpack completion.

6. The final design is pegged out by surveyors. Disturbance is recorded as the area provided to the Principal Contractor to be cleared. Where the actual area cleared is smaller than the design, this is reported to Australia Pacific LNG by the Principal Contractor for accurate disturbance recording.

The Protocol documents the environmental requirements to be addressed in the final design. Following pegging of the design at the site, interaction and management of MNES is undertaken through the implementation of species management plans.

2.4 Species Management Plans

In accordance with Condition 7 of the approval, Australia Pacific LNG has developed three species management plans:

- Threatened Fauna Management Plan (TFMP);
- Threatened Flora Management Plan (TFLMP); and
- Threatened Ecological Community Management Plan (TECMP).

The TFMP, TFLMP and TECMP address the development approval conditions for threatened and migratory fauna species, threated terrestrial flora species, and TECs listed under the EPBC Act. These management plans relate to species that are known to occur and that may potentially occur within the approved Australia Pacific LNG gas field. Each management plan also provides technical information and appropriate measures to help avoid and mitigate potential impacts.

Condition 9 of the Approval requires implementation of the Species Management Plans.

2.4.1 Implementation Process

The species management plans detail impact minimisation and management practices for threatened fauna, flora and ecological communities. The plans address the development, construction, operation and decommissioning phases of the project, as well as monitoring requirements.

3 METHODOLOGY

The audit was conducted in accordance with EPBC 2009/4974 approval conditions 102 to 107, using audit criteria approved by the Department. The audit was carried out in accordance with AS/NZS ISO 19011:2003 Guidelines for quality and/or environmental management systems auditing and the audit principles contained within the Department guidelines.

3.1 Audit Team

URS established a highly experienced and qualified independent audit team to undertake the work. The auditors were led by Rob Storrs, a qualified QSA Environmental Auditor (certificate provided in Appendix B). The team structure is shown in Figure 3-1 and details of each audit team member are summarised in Table 3-1 (CVs are provided in Appendix B). The URS audit team have been recognised by the Department to meet the criteria of an independent auditor in accordance with condition 103 of the approval[4].

Figure 3-1 Audit Team Structure

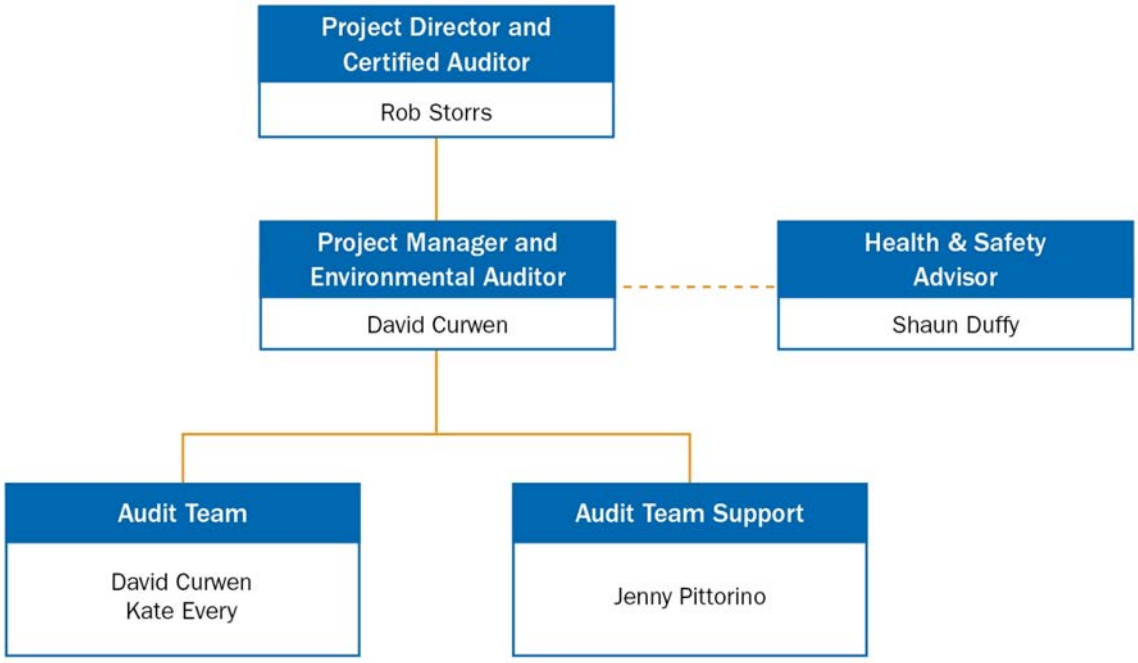


Table 3-1 Audit Team Qualifications

Personnel	Qualifications	Role	Experience (years)
Rob Storrs	BEnvSc (Hons)	Project Director Lead Auditor	20
David Curwen	BSc (Hons), MSc	Project Manager Environmental Auditor	19
Kate Every	BSc (Marine Science), MEnvMan	Environmental Auditor	4
Shaun Duffy	AdvDipOHS	Health and Safety Manager	20

[4] Letter from Shane Gaddes to Rob Ully, dated 12 May 2014. Department of the Environment reference: 2014/02846

3.2 Audit Criteria

The audit criteria was approved by the Department on 11 December 2014, in accordance with condition 103 of the approval[5]. The criteria form a compliance evaluation table including:

- Criterion (the approval condition);
- Independent auditor comments (audit findings);
- Measurements made (evidence reviewed);
- Requirement (how compliance is to be assessed);
- Verification method; and
- Compliance finding.

The compliance finding ratings, in accordance with the Department's Audit Criteria and Methodology, are as follows:

- Compliance - A rating of 'compliance' is given when the auditee has complied with a condition or element of a condition;
- Non-compliance - A rating of 'non-compliance' is given when the auditee has not met a condition or element of a condition;
- Not applicable - A rating of 'not applicable at the time of the audit' is given when the condition or element of a condition falls outside the scope of the audit e.g. if an activity has not yet commenced;
- Undetermined - A rating of 'undetermined' is given when the condition or element of a condition falls inside the scope of the audit but there is insufficient evidence to make a judgment on compliance or non-compliance; and
- Observation - An 'observation' may be made about issues relevant to the protection of a matter of national environmental significance when the issue is not strictly related to compliance or non-compliance with a condition or element of a condition.

The compliance evaluation table is provided in Appendix A.

3.3 Approach

The audit sought to review documentation and site implementation where current activities are most relevant to MNES. As described in Section 2.3, the requirements of the Protocol are applicable across all of the Walloons gas fields and all aspects of the project, including well head drilling and commissioning, gas field facilities sites, the gathering network and high pressure pipeline. Implementation is understood to be consistent at each gas field as each Principal Contractor across the project receives environmental information in the same format (the environmental workpack). As such, the Combabula Development Area was targeted as a representative sample of activities across the gas fields. It is considered that a focus on Combabula is sufficient to meet the audit objective of verifying the effectiveness of approval conditions in protecting MNES, and whether the action is being undertaken in accordance with the approval conditions.

[5] Letter from Shane Gaddes to Rob Ully dated 11 December 2014, Department of the Environment reference 14/008248

3.3.1 Desktop Assessment

URS requested copies of all documentation that the approval conditions required to be prepared, including the Protocol and Species Management Plans. The nature and extent of these documents were reviewed and their compliance against the requirements of the approval conditions assessed and recorded in the compliance evaluation table.

3.3.2 Site Audit

A site visit to the Combabula development area was undertaken on 2 and 3 February 2015 to assess conditions that required visual inspection. Within the Combabula gas field, a review of the various operations currently being undertaken by the Gathering, Facilities, and Drilling and Completions teams was carried out. The purpose of this review was to identify those locations where the audit team could see evidence of the management of MNES and implementation of the various management plans. The locations identified for the site visit were:

- Combabula gas processing facility (GPF);
- Golden & Wathen Zones 2A; and
- RG Golden property.

During the site visit, information required to assess compliance was collected through both observations and discussions with Origin, Leighton (Principal Contractor, Gathering Network), and Laing O'Rourke (Principal Contactor, GPF) personnel.

Following the initial documentation review and site visit, a list of outstanding evidence was compiled and provided to Origin.

3.4 Assumptions

The audit evidence is based on samples of the available information, which is considered to be representative of the operations across the Walloons gas fields and best capture the potential for impacts to MNES at the time of the audit. This approach and the level of uncertainty is consistent with the guidance provided in ISO 19011.

All documentary evidence provided by individuals during this audit was assumed to be current and accurate at the time of the audit. It was understood that URS would be notified of any updates to this documentation made during the audit, to be included as a post-audit note within the report.

Verbal communications were taken at face value unless evidence highlighted conflict or inconsistencies and warranted further investigation. Verbal communications were of particular importance when auditing conditions or events that had not yet occurred, and where no complaints had been received (i.e. in cases where there was no evidence to prove a non-event).

4 AUDIT RESULTS

4.1 Audit Findings Overview

The audit scope included conditions 3 to 13 and 20 to 26 of the approval. The compliance evaluation considers each of these conditions and their sub-conditions as a separate criterion. Conditions 5 and 8 have also been assessed for compliance on separate implementation checklists using the templates provided by the Department. These checklists are provided in Appendix A.

Overall, the project was assessed as highly compliant, with conditions in non-compliance summarised in Table 4-1 and Table 4-2. These non-compliances are discussed further in Section 4.2. There were several conditions (or subconditions) for which a compliance rating was not able to be determined, due to the unavailability of sufficient evidence.

Table 4-1 Summary of Conditions in Non-compliance (Documentation Checklist)

Condition number	Condition Requirement
5o)v)	The Protocol must ensure site assessments and field ecological surveys document the survey methodology, results and significant findings in relation to MNES.
8j)	The management plans required under condition 7 must…as a minimum address the following as relevant to each MNES: surface and ground water quality and quantity requirements, including relevant downstream environmental quality parameters.
13a)	If an impact occurs (which may include a presumed impact where the species is presumed to be present) to a MNES during gas field development, operation, or decommissioning the proponent must: a) record the impact by reference to: i) the location, specific site and type of infrastructure or activity; ii) each MNES subject to disturbance; iii) the related site assessment or field ecological survey documentation and recommendations, or the decision that the particular MNES was presumed to be present; iv) the disturbance limit set under condition 25; v) the total area of actual disturbance; vi) the remaining disturbance limit for each affected MNES; vii) the reasons for the decision including justification for the action taken, description of the efforts taken to avoid impact, and explanation why other constraints might justify the impact on MNES; viii) actions and commitments by the proponent to remediate, rehabilitate, or make good any unauthorised disturbance.

Table 4-2 Summary of Conditions in Non-compliances (Implementation Checklist)

Condition number	Condition Requirement
5o)ii)	The Protocol must ensure site assessments and field ecological surveys take into account and reference previous ecological surveys undertaken in the area and relevant new information on likely presence or absence of MNES;

4.2 Discussion of non-compliances

The Protocol was approved by the Department on 1 September 2011[6] as meeting conditions 5, 6, 13 and 21 of the approval. The same approval letter acknowledged the TFMP, TFLMP, TECMP as meeting conditions 5 (h and p), 7, 8, 9 and 10.

At the Department's request, the Protocol and plans were reviewed against the conditions to assess whether all requirements have been included. The Protocol was assessed as containing all required inclusions, with the exception of sub-condition 5.o)v) (documenting survey methodology in pre-clearance ecological surveys). It was noted that survey methodology was documented in the pre-clearance surveys sighted during the audit, despite the requirement not being specifically outlined in the Protocol. The Species Management Plans were assessed as containing all required inclusions, with the exception of sub-condition 8j) (include surface and ground water quality and quantity requirements).

In accordance with condition 5o)ii), the Protocol requires that site assessments and field ecological surveys take into account and reference previous ecological surveys undertaken in the area and relevant new information on likely presence or absence of MNES. However, while several documents did contain references, this has not been undertaken in all of the ecology assessment reports or pre-clearance surveys provided during the audit. As such, the condition was assessed as non-compliant.

Condition 13 of the approval require disturbance to MNES to be recorded. Records were provided for disturbance to TECs during the audit, however the auditors were advised that disturbance to potential habitat for threatened fauna is not currently documented. As potential habitat is not recorded, it could not be determined that current disturbance levels are within the limit required by Condition 25. It is understood that classification of potential habitat is the subject of ongoing discussion between Origin and the Department.

4.3 Site visit observations

Impact Minimisation

It was observed during the site visit that, where possible, Principal Contractors are minimising the extent of their clearance below the authorised disturbance. Specific examples are provided below:

- The GPF workpack (Q-4200-15-WP-1005) specifies a maximum disturbance area to TECs of 3.667ha at the southern end of the GPF, however Laing O'Rourke have minimised this total disturbance to 1.6274 ha.
- Well leases are classified as either a civil lease (cut and fill, full clearance, removal of topsoil) or a minimum disturbance lease (MDL) (vegetation slashed, no disturbance of soil). Examples of each lease type were observed during the site visit, with site personnel advising that MDLs are the preferred option where the safety of crew and equipment is not compromised.
- Leighton (Principal Contractor on the Combabula gathering network) advised that, where safe and possible, clearing is not conducted to the full width of the right of way (ROW).

[6] Letter from James Barker (A/g Assistant Secretary, Environment Assessment Branch 2) to Katherine Jack (Senior Environmental Advisor, Origin Energy), dated 1 September 2011. Department of the Environment references 2011/05747, 2011/05126, and 2011/05748

TEC management

In order to view current examples of MNES interaction, the auditors specifically visited sites where TEC's are either being cleared or are adjacent to activities.

Signage identifying TECs was observed at locations within the GPF, drilling (CMN280) and gathering (CMN111-2) footprints (Figure 4-1, Figure 4-2, and Figure 4-3). This signage is in line with the management requirements detailed in the respective environmental workpacks. The auditors were informed that signage is spaced at the environmental advisors' discretion. It was noted that field staff had erred on the side of caution in placing signage to keep ecological issues high profile, even in areas where TECs were nearby but outside disturbance areas.

Fencing of TECs was observed at the GPF site using blue rope rather than bunting; this was at the landowner's request. Well leases are staked and fenced prior to clearing to prevent unauthorised interaction with TECs, however the gathering network was not fenced due to its length and the progressive movement along the ROW.

Figure 4-1 GPF TEC signage

Figure 4-2 Well lease signage (off lease TEC)

Figure 4-3 Gathering network TEC signage

Note: TEC designation relates to dense stand of trees visible in the background.

Reinstatement

At the completion of construction activities, areas are required to be reinstated. Reinstatement involves the respreading and seeding of topsoil. This was observed along the GPF access road, gathering network and on completed well leases, with recent rain promoting vegetation growth. In particular, long stretches of successful reinstatement was observed along the gathering ROW (Figure 4-4).

Figure 4-4 Reinstatement along gathering network ROW

On-site knowledge of environmental requirements

During the site audit, it was apparent that site personnel from Origin, Leighton, Laing O'Rourke and Queensland Fauna Consultancy were confident in their understanding of environmental requirements. This knowledge primarily included the specifics of the environmental workpacks, as well as fauna and flora management and erosion and sediment control relevant to the site.

5 RECOMMENDATIONS AND CONCLUSIONS

5.1 Conclusions

The audit identified and focused on a representative sample of documentation and site implementation across the Walloons gas fields to assess compliance against specific conditions of the Project's approval (EPBC 2009/4974).

A number of conclusions have been identified as a result of this audit:

- Overall, the project was assessed as highly compliant. With the exception of the minor non-compliances identified in Section 4, the action is being undertaken in accordance with the approval conditions;
- No evidence of impact to MNES, other than approved disturbance, was identified during the audit;
- Evidence of minimisation of disturbance areas by Principal Contractors was noted;
- Environmental non-compliances with the scoped conditions were primarily associated with minor omissions in documentation or a result of ongoing discussions with the Department (e.g. potential habitat); and
- On-site personnel were confident and knowledgeable regarding environmental requirements for interaction with MNES.

5.2 Recommendations

Where non-compliance has been identified during this audit, the following recommendations are made to assist with future compliance:

- Ensure all conditions requirements are included in future revisions of the Protocol and species management plans, or consider amending conditions;
- Continue discussions with the Department regarding the classification of potential habitat for threatened fauna, in order to adequately record disturbance; and
- Further improve the verification of disturbance records with the expanded use of aerial imagery, allowing comparison against the approved disturbance area provided to Principal Contractors.

6 LIMITATIONS

URS Australia Pty Ltd (URS) has prepared this report in accordance with the usual care and thoroughness of the consulting profession for the use of Origin Energy and only those third parties who have been authorised in writing by URS to rely on this Report.

It is based on generally accepted practices and standards at the time it was prepared. No other warranty, expressed or implied, is made as to the professional advice included in this Report.

It is prepared in accordance with the scope of work and for the purpose outlined in the contract dated 18 February 2013.

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It is the responsibility of third parties to independently make inquiries or seek advice in relation to their particular requirements and proposed use of the site.

Any estimates of potential costs which have been provided are presented as estimates only as at the date of the Report. Any cost estimates that have been provided may therefore vary from actual costs at the time of expenditure.

APPENDIX A COMPLIANCE EVALUATION TABLES

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
EPBC Approval	To develop, construct, operate and decommission the coal seam gas field component of the Australia Pacific LNG Project in the Walloons gas fields with the Surat Basin in south Central Queensland, (EPBC 2009/4974).					
Criterion 3	Before the commencement of gas field development, the proponent must develop a Constraints Planning and Field Development Protocol (the Protocol).	The Protocol was issued as final on 31 August 2011. No amendments to the Protocol had been made at the time of the audit. Early works commenced at the gas fields on 19 October 2011, as per the notification to DSEWPac on 5 December 2011.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011 Email from Vicki Low (Australia Pacific LNG) to Dieter Kluger, subject DSEWPaC Weekly APLNG Activity Update, dates 5 December 2011.	Check that a Constraints Planning and Field Development Protocol (the Protocol) has been developed prior to commencement of gas field development.	Evaluation of evidence, including date of Protocol issue and emails and letters regarding commencement of operations.	Compliant
Criterion 4	The Protocol must apply for the life of the project.	Section 9 of the Protocol states that "the approved Protocol will be incorporated into management procedures, operational plans and documentation and kept current for the life of the project"	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check Protocol includes statement confirming it applies for life of project.	Evaluation of the protocol to ensure it includes reference to applying for the life of the project.	Compliant
Criterion 4	The Protocol must include the principles of:					
Criterion 4a	a) avoiding direct and indirect adverse impacts on MNES;	Section 3 of the Protocol lists principle (a).	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Protocol to include principles listed in condition.	Protocol sighted and reviewed by auditors to determine if it includes principle (a).	Compliant
Criterion 4b	b) mitigating and managing direct and indirect impacts to minimise cumulative adverse impacts on matters of national environmental significance (MNES);	Section 3 of the Protocol lists principle (b).	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Protocol to include principles listed in condition.	Protocol sighted and reviewed by auditors to determine if it includes measure (b).	Compliant
Criterion 4c	c) active site remediation and rehabilitation of impacted areas to promote and maintain long-term recovery of MNES.	Section 3 of the Protocol lists principle (c).	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Protocol to include principles listed in condition.	Protocol sighted and reviewed by auditors to determine if it includes measure (c).	Compliant
Criterion 5	Protocol imposed constraints and assessment requirements -					
Criterion 5	5. The Protocol must:					
Criterion 5a	a. classify the following as being within the proponent's sensitivity categories 1 to 4 (or should the proponent's classification be revised, equivalent high environmental constraints class):					
Criterion 5a.i)	i. all listed threatened ecological communities;	This is addressed in Section 5.1.1.2 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes a) i).	Evaluation of the protocol to ensure it includes a) i).	Compliant
Criterion 5a.ii)	ii. all listed flora species; and	This is addressed in Section 5.1.1.2 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes a) ii).	Evaluation of the protocol to ensure it includes a) ii).	Compliant
Criterion 5a.iii)	iii. those listed threatened and migratory fauna species habitats as identified in management plans required under these conditions, which where relevant may be described in terms of specific niche habitat types;	This is addressed in Section 5.1.1.2 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes a) iii).	Evaluation of the protocol to ensure it includes a) iii).	Compliant
Criterion 5b	b. include constraints mapping for sensitivity category 1-7 as described in the proponent's Environmental Impact Statement;	Figures are not included in the Protocol. However, a cross reference is provided in the text to the APLNG EIS where BAAM sensitivity mapping for the project is provided (Volume 2, Chapter 8, Figure 8.7)	Australia Pacific LNG EIS, http://www.aplng.com.au/environment/our-environmental-impact-statement	Check the protocol includes b)	Evaluation of the protocol to ensure it includes b).	Compliant
Criterion 5c	c. require pre-clearance site assessments of sensitivity category 1-4 by an approved suitably qualified ecologist;	Section 7.2 of the Protocol states that prior to conducting petroleum activities that involve significance disturbance to land, an assessment will be undertaken of the condition, type and ecological value of vegetation in the area. Section 7.2 also states that the pre-clearance assessment must be conducted by qualified persons approved by DSEWPaC if the areas proposed to be disturbed are identified to contain Ecological Sensitivity Mapping Categories 1-4	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes c)	Evaluation of the protocol to ensure it has included the requirements of c).	Compliant
Criterion 5d	d. require pre-clearance site assessments of sensitivity category 5-7 by a suitably qualified environment officer;	Section 7.2 of the Protocol states that prior to conducting petroleum activities that involve significance disturbance to land, an assessment will be undertaken of the condition, type and ecological value of vegetation in the area. The assessment of Categories 5-7 will be conducted by a suitably qualified environmental officer	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes d)	Evaluation of the protocol to ensure it has included the requirements of d).	Compliant
Criterion 5e	e. for any MNES identified following an assessment under 5d, require review of those pre-clearance site assessments by a suitably qualified ecologist;	Section 7.2.2 of the Protocol states that if in the course of pre-clearance field ecological assessment of areas of ecological sensitivity category 5-7 MNES is identified, these reports will be reviewed by an approved ecologist	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes e)	Evaluation of the protocol to ensure it has included the requirements of e).	Compliant
Criterion 5f	f. update constraints mapping with results of any pre-clearance site assessments which confirm presence of MNES;	Section 7.2.2 of the Protocol states that Site level field ecology assessment data captured in accordance with this Protocol will be used to create and continually update a data layer displayed in the Origin GIS. This “ground truthed” ecology data will represent the most up to date and accurate ecology information describing the project area.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes f)	Evaluation of the protocol to ensure it has included the requirements of f).	Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
Criterion 5g	g. require the documentation of all planning decisions and pre-clearance site assessments and field ecological surveys in proposed gas fields development areas where sensitivity category 1-4 is mapped, likely, or found;	Section 7.1 of the Protocol states that the Environmental Advisor will conduct an initial evaluation of proposed infrastructure layouts and locations via a desktop assessment, which will include documentation of environmental constraints assessments and infrastructure planning decisions including initial completion of the environmental constraints checklist, which will be updated with ecological and field assessment data	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes g)	Evaluation of the protocol to ensure it has included the requirements of g).	Compliant
Criterion 5h	h. implement species management plans (as required in condition 7);	Section 7.1 of the Protocol states that the desktop assessment should, as a minimum consider the requirements of Threatened Species Plans and Threatened Ecological Community Plans	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes h)	Evaluation of the protocol to ensure if has included the requirements of h).	Compliant
Criterion 5i	i. calculate disturbance as required in condition 13;	Section 7.7.1 states that total planned disturbance will be calculated using the Origin GIS by overlaying the approved infrastructure layouts over the field ecological assessment mapping, vegetation and land use datasets. Planned disturbance will be calculated on the basis of approved infrastructure designs and issued for construction work packs.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	The protocol must require calculation of disturbance areas (see condition 13)	Review the protocol to determine if it requires calculation of disturbance areas as required in condition 13.	Compliant
Criterion 5j	j. take into account all current survey data and available information and maps of all MNES relevant to the project area as described within environmental sensitivity category 1-4; and	Section 7.1 of the Protocol states that the desktop assessment should, as a minimum, consider potential impacts on MNES including data from EPBC Protected Matters search results, previous ecological surveys undertaken in the area and relevant new information on likely presence or absence of MNES	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes j)	Evaluation of the protocol to ensure it has included the requirements of j).	Compliant
Criterion 5k	k. require the pre-clearance site assessments and field ecological surveys to identify and assess options relating to development impacts on MNES and provide recommendations to inform the development of the project area;	Section 7.2 of the Protocol states that the scope of the pre-clearance field ecological assessment shall include site specific management recommendations to minimise impact on MNES, significant flora and fauna including identification of previously cleared or disturbed areas or lower value vegetation	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes k)	Evaluation of the protocol to ensure if has covered the requirements of k).	Compliant
Note	Note: The proponent's approach to sensitivity mapping relates to impact avoidance and mitigation as described in volume 2, chapter 23 of the proponent's Environmental Impact Statement (publicly released 20 March 2010). The indicative sensitivity categories described in the EIS are:					Not applicable
	Category 1: Extremely sensitive: Siting of infrastructure within these areas will be avoided.	Section 7.6.1 of the Protocol states that terrestrial ecology sensitivity category as identified and mapped in the EIS, and as updated, will be applied to siting of all infrastructure types in accordance with the requirements set out in Table 4. Table 4 reflects this condition's description of the sensitivity category management.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011		Review the protocol to determine of Category 1 requirements are addressed.	Compliant
	Category 2: Highly Sensitive: Infrastructure will only be located within or in proximity to existing cleared and disturbed areas to reduce fragmentation; Limited clearing (if necessary for incremental expansion of existing disturbance) for construction to be rehabilitated prior to operation.	Section 7.6.1 of the Protocol states that terrestrial ecology sensitivity category as identified and mapped in the EIS, and as updated, will be applied to siting of all infrastructure types in accordance with the requirements set out in Table 4. Table 4 reflects this condition's description of the sensitivity category management.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011		Review the protocol to determine of Category 2 requirements are addressed.	Compliant
	Category 3: Sensitive: Clearing only for linear infrastructure and well leases. Non-linear infrastructure to be located within or in proximity to existing cleared and disturbed areas. Disturbed areas not required for ongoing operation to be rehabilitated prior to operation.	Section 7.6.1 of the Protocol states that terrestrial ecology sensitivity category as identified and mapped in the EIS, and as updated, will be applied to siting of all infrastructure types in accordance with the requirements set out in Table 4. Table 4 reflects this condition's description of the sensitivity category management.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011		Review the protocol to determine of Category 3 requirements are addressed.	Compliant
	Category 4: Neutral: Clearing for linear and non-linear infrastructure is to minimise edge effects where possible.	Section 7.6.1 of the Protocol states that terrestrial ecology sensitivity category as identified and mapped in the EIS, and as updated, will be applied to siting of all infrastructure types in accordance with the requirements set out in Table 4. Table 4 reflects this condition's description of the sensitivity category management.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011		Review the protocol to determine of Category 4 requirements are addressed.	Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
	Category 5: Robust: Clearing for infrastructure, although hollow-bearing trees and habitat connectivity, particularly along watercourses, to be retained.	Section 7.6.1 of the Protocol states that terrestrial ecology sensitivity category as identified and mapped in the EIS, and as updated, will be applied to siting of all infrastructure types in accordance with the requirements set out in Table 4. Table 4 reflects this condition's description of the sensitivity category management.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011		Review the protocol to determine of Category 5 requirements are addressed.	Compliant
	Category 6 and 7: Cleared: Siting of infrastructure >100m from edges of categories 2-5 and >200m from category 1.	Section 7.6.1 of the Protocol states that terrestrial ecology sensitivity category as identified and mapped in the EIS, and as updated, will be applied to siting of all infrastructure types in accordance with the requirements set out in Table 4. Table 4 reflects this condition's description of the sensitivity category management.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011		Review the protocol to determine of Category 6 & 7 requirements are addressed.	Compliant
Criterion 5l	l. to avoid direct and indirect adverse impacts on MNES, including fragmentation and edge effects, provide that proposed infrastructure is located in accordance with the following:					
Criterion 5l	When siting exploration and production wells:					
Criterion 5l.i)	i. avoid development within sensitivity category 1 unless authorised in writing by the Department;	Section 7.6.4 of the Protocol states that when making decisions regarding the siting of infrastructure the following requirements must be satisfied - avoid development within areas mapped as ecological sensitivity category	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) i)	Evaluation of the protocol to ensure it has included the requirements of 5l) i).	Compliant
Criterion 5l.ii)	ii. avoid development within sensitivity category 2-4, unless the location within any of these sensitivity categories is justified given other constraints, and the impact on any MNES will be minimal, short term and recoverable;	Section 7.6.4 of the Protocol states that when making decisions regarding the siting of infrastructure the following requirements must be satisfied - avoid development within ecological sensitivity category 2-4 unless the location within any of these sensitivity categories is justified given other constraints, and the impact on MNES will be minimal, short term and recoverable	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) ii)	Evaluation of the protocol to ensure it has included the requirements of 5l) ii).	Compliant
Criterion 5l.iii)	iii. where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site the wells in proximity to cleared areas, or in areas of lower ecological condition such as previously disturbed or degraded areas; and	Section 7.6.4 of the Protocol states that when making decisions regarding the siting of infrastructure the following requirements must be satisfied - where development cannot avoid areas of MNES within sensitivity categories 2-4, preferentially avoid areas of MNES that constitutes an EPBC listed ecological community and/or may provide habitat for EPBC listed species, and site infrastructure in/or in proximity to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) iii)	Evaluation of the protocol to ensure it has included the requirements of 5l) iii).	Compliant
Criterion 5l.iv)	iv. where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist.	Section 7.6.1 of the Protocol states that, where required, management areas, exclusion zones, and/or no impact zones surrounding areas of defined sensitivity categories will be determined on a site basis taking into account the written ecological advice of an approved ecologist	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) iv)	Evaluation of the protocol to ensure it has included the requirements of 5l) iv).	Compliant
Note	Note: Directional drilling and multiple drill holes from one well pad are options to avoid well site and related infrastructure disturbance to sensitivity category 1-4.			Note this is not mandatory and is for information only.	This is not a requirement, hence it will not be audited in terms of compliance and non-compliance.	
Criterion 5l	When siting non- linear infrastructure:			When siting non- linear infrastructure:		
Criterion 5l.i)	i) avoid development within sensitivity category 1 unless authorised in writing by the Department;	Section 7.6.4 of the Protocol states that when making decisions regarding the siting of infrastructure the following requirements must be satisfied - avoid development within areas mapped as ecological sensitivity category	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) i)	Evaluation of the protocol to ensure it has included the requirements of 5l) i).	Compliant
Criterion 5l.ii)	ii) avoid development within sensitivity category 2-4, unless the location within any of these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable;	Section 7.6.4 of the Protocol states that when making decisions regarding the siting of infrastructure the following requirements must be satisfied - avoid development within ecological sensitivity category 2-4 unless the location within any of these sensitivity categories is justified given other constraints, and the impact on MNES will be minimal, short term and recoverable	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) ii)	Evaluation of the protocol to ensure it has included the requirements of 5l) ii).	Compliant
Criterion 5l.iii)	iii) where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site infrastructure in or approximate to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas; and	Section 7.6.4 of the Protocol states that when making decisions regarding the siting of infrastructure the following requirements must be satisfied - where development cannot avoid areas of MNES within sensitivity categories 2-4, preferentially avoid areas of MNES that constitutes an EPBC listed ecological community and/or may provide habitat for EPBC listed species, and site infrastructure in/or in proximity to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) iii)	Evaluation of the protocol to ensure it has included the requirements of 5l) iii).	Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
Criterion 5l.iv)	iv) where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist.	Section 7.6.1 of the Protocol states that, where required, management areas, exclusion zones, and/or no impact zones surrounding areas of defined sensitivity categories will be determined on a site basis taking into account the written ecological advice of an approved ecologist	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) iv)	Evaluation of the protocol to ensure it has included the requirements of 5l) iv).	Compliant
Criterion 5l	When siting linear infrastructure:			When siting linear infrastructure:		
Criterion 5l.i)	i) avoid development within sensitivity category 1 unless authorised in writing by the Department;	Section 7.6.4 of the Protocol states that when making decisions regarding the siting of infrastructure the following requirements must be satisfied - avoid development within areas mapped as ecological sensitivity category	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) i)	Evaluation of the protocol to ensure it has included the requirements of 5l) i).	Compliant
Criterion 5l.ii)	ii) avoid development within sensitivity category 2-4, unless their location within these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable;	Section 7.6.4 of the Protocol states that when making decisions regarding the siting of infrastructure the following requirements must be satisfied - avoid development within ecological sensitivity category 2-4 unless the location within any of these sensitivity categories is justified given other constraints, and the impact on MNES will be minimal, short term and recoverable	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) ii)	Evaluation of the protocol to ensure it has included the requirements of 5l) ii).	Compliant
Criterion 5l.iii)	iii) where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site infrastructure in or approximate to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas; and	Section 7.6.4 of the Protocol states that when making decisions regarding the siting of infrastructure the following requirements must be satisfied - where development cannot avoid areas of MNES within sensitivity categories 2-4, preferentially avoid areas of MNES that constitutes an EPBC listed ecological community and/or may provide habitat for EPBC listed species, and site infrastructure in/or in proximity to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) iii)	Evaluation of the protocol to ensure it has included the requirements of 5l) iii).	Compliant
Criterion 5l.iv)	iv) where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist.	Section 7.6.1 of the Protocol states that, where required, management areas, exclusion zones, and/or no impact zones surrounding areas of defined sensitivity categories will be determined on a site basis taking into account the written ecological advice of an approved ecologist	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5l) iv)	Evaluation of the protocol to ensure it has included the requirements of 5l) iv).	Compliant
Note	Note: Justification is reportable in accordance with condition 13 a) vii). The management plan requirements under condition 8 h) may also indicate that a species or its habitat can co-exist with specific types of gas field infrastructure and operations.	Section 7.7.2.1 of the Protocol states that actual disturbance to an MNES requires justification for the action taken to be recorded.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011		Review the protocol to determine if it includes measures in accordance with condition 13 a) vii) and management plan requirements under condition 8 h) in accordance with Note.	Compliant
Criterion 5m	m. require the proponent to plan for and decide the extent that proposed linear infrastructure may have adverse impacts on MNES in accordance with the following:			Check the protocol includes 5m)	Evaluation of the protocol to ensure it has covered the requirements of 5m).	
Criterion 5m.i)	i. all linear disturbance within sensitivity category 1-4 for MNES and the impact risk zone must be:	Section 7.6.4.1 of the Protocol states that linear infrastructure within and 200m surrounding ecological sensitivity categories 1-4 where MNES is confirmed or presumed to be found must comply with the following limits on development	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	The protocol must ensure linear disturbance in cat 1-4 is:	Review the protocol to determine if it includes measures to must ensure linear disturbance in cat 1-4 is:	Compliant
Criterion 5m.i)I	I. limited to 12 metres in width for a single flow line;	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) I	Evaluation of the protocol to ensure it has included the requirements of 5m.i) I.	Compliant
Criterion 5m.i)II	II. limited to 18 metres in width for trenches with one water gathering line and one parallel gas gathering line;	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) II	Evaluation of the protocol to ensure it has included the requirements of 5m.i) II.	Compliant
Criterion 5m.i)III	III. limited to 25 metres in width for multiple trenches where there are three parallel gas or water gathering lines or a single large diameter water pipeline (500mm or above);	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) III	Evaluation of the protocol to ensure it has covered the requirements of 5m.i) III.	Compliant
Criterion 5m.i)IV	IV. limited to 30 metres in width for any single high pressure gas pipeline less than 750mm diameter;	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) IV	Evaluation of the protocol to ensure it has covered the requirements of 5m.i) IV.	Compliant
Criterion 5m.i)V	V. limited to 40 metres in width for any single high pressure gas pipeline of diameter equal to or greater than 750mm diameter;	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) V	Evaluation of the protocol to ensure it has covered the requirements of 5m.i) V.	Compliant
Criterion 5m.i)VI	VI. limited to an additional 7 metres for each additional trench for water or gas lines;	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) VI	Evaluation of the protocol to ensure it has covered the requirements of 5m.i) VI.	Compliant
Criterion 5m.i)VII	VII) limited to an additional 10 metres for each additional high pressure gas pipeline or large diameter water pipeline (500mm or above);	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) VII	Evaluation of the protocol to ensure it has covered the requirements of 5m.i) VII.	Compliant
Criterion 5m.i)VIII	VIII) limited to disturbance within identified infrastructure corridors;	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) VIII	Evaluation of the protocol to ensure it has covered the requirements of 5m.i) VIII.	Compliant
Criterion 5m.i)IX	IX) where feasible, trenches, pipelines for associated water and other transmissions lines must be co-located to reduce total disturbance on MNES; and	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) IX	Evaluation of the protocol to ensure it has covered the requirements of 5m.i) IX.	Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
Criterion 5m.i)X	X) co-location will not be implemented where an assessment has determined that it is likely to increase impacts to MNES.	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.i) X	Evaluation of the protocol to ensure it has covered the requirements of 5m.i) X.	Compliant
Note	Note 1: These widths include provision for a utility corridor and access track.	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011		Review the protocol to determine if it specifies widths include provision for a utility corridor and access track in accordance with Note 1.	Compliant
Criterion 5m.ii)	ii. In limited circumstances only (e.g. river crossings, where there are abnormal access constraints into a gas processing facility and when within close proximity to other proponent's linear infrastructure), increased corridor widths within areas of MNES may be required. In those circumstances a risk based site assessment will be completed to determine disturbance to MNES, identify management measures to minimise impacts to MNES and to justify the additional disturbance to MNES. The assessment will be available to the Department prior to any disturbance.	This requirement is addressed in Section 7.6.4.1 of the Protocol	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5m.ii)	Evaluation of the protocol to ensure it has covered the requirements of 5m.ii)	Compliant
Note	Note: Any area of a disturbance referred to in this condition would be subtracted from the disturbance limits specified elsewhere in these conditions.	Section 7.6.4.1 of the Protocol states that infrastructure planning and design must take into account current planned and actual disturbance and limits to disturbance set out in project approvals. New infrastructure must not be approved for development where this would cause disturbance limits to be exceeded.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011		Review the protocol to determine if the requirements of the note are addressed.	Compliant
Criterion 5n	n. support bioregional corridors for listed threatened species and migratory species, and connectivity for listed threatened ecological communities;	Section 7.2 states that the scope of the pre-clearance field ecological assessment shall include consider constraints on infrastructure layout relevant to bioregional corridors including for EPBC listed threatened species, migratory species and connectivity for EPBC listed threatened ecological communities	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the protocol includes 5n.)	Evaluation of the protocol to ensure it has covered the requirements of 5n.)	Compliant
Criterion 5o	o. ensure site assessments and field ecological surveys:			The protocol must ensure site assessments and surveys:		
Criterion 5o.i)	i. are undertaken in accordance with the Department's survey guidelines in effect at the time of the survey. This information can be obtained from http://www.environment.gov.au/epbc/guidelines-policies.html#threatened;	Section 7.2 of the Protocol states that field ecology assessments of MNES must comply with SEWPAC survey guidelines and best practice survey methodology	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol includes 5o) i)	Conduct a review of the Protocol to ensure site assessments and field ecological surveys are undertaken in accordance with 5o) i).	Compliant
Criterion 5o.ii)	ii. take into account and reference previous ecological surveys undertaken in the area and relevant new information on likely presence or absence of MNES;	Section 7.1 of the Protocol states that the desktop assessment should, as a minimum, consider potential impacts on MNES including data from EPBC Protected Matters search results, previous ecological surveys undertaken in the area and relevant new information on likely presence or absence of MNES	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol includes 5o) ii)	Conduct a review of the Protocol which relates to site assessments and field ecological surveys and check if requirement 5o) ii) has been included.	Compliant
Criterion 5o.iii)	iii. are undertaken by a suitably qualified ecologist approved by the Department for sensitivity categories 1-4;	Section 7.2 of the Protocol states that the pre-clearance assessment must be conducted by qualified persons approved by DSEWPaC if the areas proposed to be disturbed are identified to contain Ecological Sensitivity Mapping Categories 1-4	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol includes 5o) iii)	Conduct a review of the Protocol to ensure site assessments and field ecological surveys are undertaken in accordance with 5o) iii).	Compliant
Criterion 5o.iv)	iv. are undertaken by a suitably qualified environment officer for sensitivity categories 5-7;	Section 7.2 of the Protocol states that assessment of Categories 5-7 will be conducted by a suitably qualified environmental officer	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol includes 5o) iv)	Conduct a review of the Protocol to ensure site assessments and field ecological surveys are undertaken in accordance with 5o) iv).	Compliant
Criterion 5o.v)	v. document the survey methodology, results and significant findings in relation to MNES.	Section 7.2.2 of the Protocol states that the preliminary report should include a description of identified habitat for State or Commonwealth listed species or communities, including assessment of the quality of the habitat and its likelihood of supporting listed species, and notation of and other significant findings in relation to MNES or other findings of critical importance. The Protocol does not contain a requirement for the survey methodology to be documented.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol to ensure it includes 5o) v)	Conduct a review of the Protocol to ensure site assessments and field ecological surveys and check if 5o) v) has been included.	Not compliant
Criterion 5o.vi)	vi. apply best practice site assessment and ecological survey methods appropriate for each listed threatened species, migratory species, their habitat and listed ecological communities as detailed in the Protocol; Note: Best practice includes applying the optimum timing and frequency of site assessments and surveys to determine presence of listed threatened species or migratory species or their habitat, or a listed threatened ecological community.	Section 7.2 of the Protocol states that field ecology assessments of MNES must comply with SEWPAC survey guidelines and best practice survey methodology	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol to ensure it includes 5o) vi)	Conduct a review of the Protocol to ensure site assessments and field ecological surveys and check if 5o) vi) has been included.	Compliant
Criterion 5o.vii)	vii. apply the mapping of environmental constraints class sensitivity category 1-4; the infrastructure location requirements; minimum no impact zones; impact risk zones; and the width requirements for linear infrastructure corridors described in (m);	This is addressed in Section 7.6.1 of the Protocol.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol to ensure it includes 5o) vii)	Conduct a review of the section of the Protocol which relates to site assessments and field ecological surveys and check if 5o) vii) has been included.	Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
Criterion 5o.viii)	viii. reports are published by the proponent on the internet 20 business days before clearance of native vegetation in an infrastructure impact area and provided to the Department on request;	Section 7.2.2 of the Protocol states that where MNES is present, reports will be published on the APLNG website 20 business days prior to clearance of native vegetation and provided to DSEWPaC on request	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol to ensure it includes 5o) viii)	Conduct a review of the section of the Protocol which relates to site assessments and field ecological surveys and check if 5o) viii) has been included.	Compliant
Criterion 5p	p. require species and ecological community management plans which include:	Section 7.4 of the Protocol states that Species and Ecological Community Management Plans will be developed for MNES	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol to ensure it includes p)		Compliant
Criterion 5p.i)	i. relevant avoidance and mitigation measures to be applied;	This is addressed in Section 7.4 of the Protocol.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol includes 5p) i)	Evaluation of the protocol to determine if 5p) i) has been included.	Compliant
Criterion 5p.ii)	ii. measures for protecting each listed threatened species and migratory species and their habitat, and each listed threatened ecological community not previously assessed by the proponent, should one or more be found in the project area at any time over the life of the project. Any such management plans must be developed in a timeframe to be approved by the Department. Notification of additional MNES found must be provided to the Department in writing within 10 business days. Measures must include the development of a management plan consistent with requirements under condition 8;	This is addressed in Section 7.4 of the Protocol.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol includes 5p) ii)	Evaluation of the protocol to determine if 5p) ii) has been included.	Compliant
Criterion 5q	q. ensure constraints planning and field development decisions are made in accordance with the Protocol (including any relevant species and ecological community management plans) before final selection of specific sites for gas field development within the project area.	Section 7.3 of the Protocol states that the scope of the pre-construction field environmental scout includes confirmation of the suitability of infrastructure layout in accordance with this Protocol and relevant species and threatened ecological community plans.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol includes 5q)	Evaluation of the protocol to determine if 5q) has been included.	Compliant
Criterion 6	6.1 The Protocol must ensure relevant information on MNES is available and used by the proponent to support field development and management decisions throughout the life of the project.	Section 7.1 of the Protocol requires the desktop assessment to consider potential impacts on MNES including data from EPBC Protected Matters search results, previous ecological surveys undertaken in the area and relevant new information on likely presence or absence of MNES. This information is also provided to field scouts (Section 7.2.1)	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check the Protocol includes the requirements of 6.	1. Review the Protocol to ensure the requirements of 6 have been addressed. 2. Hold discussions with stakeholder(s) to determine how relevant information on MNES has been and will continue to be used to support future field development and management decisions.	Compliant
Criterion 7 - split	Management Plans for Listed Species and Ecological Communities - 7.1 Before commencement of each major stage of gas field development the proponent must develop management plans for that area, which include:	The following plans have been developed by Australia Pacific LNG and approved by the Department of Sustainability, Environment, Water, Population and Communities (SEWPaC) (now Department of the Environment): -Threatened Fauna Management Plan -Threatened Flora Management Plan -Threatened Ecological Community Management Plan Approval letter states that the Protocol meets the requirements of conditions 7, 8, 9 and 10 of EPBC 2009/4974 for Stage 1 development. Early works commenced at the gas fields on 19 October 2011, following approval of the plans on 1 September 2011.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012 Letter from James Barker (SEWPaC) to Katherine Jack (Australia Pacific LNG) dated 1 September 2011. Australia Pacific LNG reference Q-LNG01-15-EA-0061 Email from Vicki Low (Australia Pacific LNG) to Dieter Kluger, subject DSEWPaC Weekly APLNG Activity Update, dates 5 December 2011.	Plans to be developed prior to commencement of each major stage of gas field development which include:	Hold discussions with key stakeholders and review supporting documentation to confirm that Management Plans for Listed Species and Ecological Communities have been developed for each major stage of the gas field development prior to the commencement of that stage.	Compliant
Criterion 7 - split	7.2 Terrestrial ecology habitat management guidelines, addressing each listed species and listed ecological community that, as indicated through assessment or more recent information, may be potentially impacted by that stage of gas field development within the project area, or external to the project area.	Habitat descriptions are provided for each individual species in the TFMP. Fauna species with common management requirements have been grouped, with impact minimisation and management practices provided for each group. Section 1.1 of the TFMP states that "separate management plans will be submitted to SEWPaC should a listed fauna species which is not included in this TFMP be identified during the lifecycle of the gas field component of the project". Auditors advised that no additional specieis have been identified, therefore no separate management plans have been submitted.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	Terrestrial ecology habitat management guidelines, addressing requirements of 7.2	Evaluate management plans to determine the requirements of 7.2 have been addressed.	Compliant
Criterion 7 - split	7.3 The management plans must address as a minimum, the ecological communities and species and their habitat as specified in **Tables 1, 2, and 3** of these conditions:	The Threatened Fauna Management Plan, Threatened Flora Management Plan and Threatened Ecological Community Management Plan contain all species listed in Tables 1, 2 and 3 of the EPBC Conditions	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	The plans must address ecological communities and species and their habitat as specified in Tables 1, 2, and 3 of these conditions.	Evaluation of management plans to determine if they address requirements of 7.3.	Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
Notes	Note 1: The proponent may develop management plans to align with the requirements of the Queensland Government where there are species and ecological communities covered by both Queensland requirements and the requirements of this approval. Note 2: Major stages of development are to be notified under condition 90.	The Threatened Fauna Management Plan addresses overlapping species of the EPBC Act and the Queensland Nature Conservation Act 1992. An addendum to this plan has been developed which addresses additional NC Act Listed Species.	Threatened Fauna Management Plan Addendum Q-LNG01-15-MP-0113_01 Revision 0 10 October 2011	Discuss with Personnel if they have done this. Note this is not mandatory.	Discussions to be held with personnel to determine if they have done this. However this is not a requirement, hence it will not be audited in terms of compliance and non-compliance.	
Table 1	**Species Management Plans required before commencement**					
	Listed fauna species	**EPBC Act status**		**Independent Auditor Comments**	**Compliance Finding**	
	Dasyurus hallucatus (Northern Quoll)	Endangered	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Chalinolobus dwyeri (Large-eared Pied Bat, Large Pied Bat)	Vulnerable	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Nyctophilus timoriensis (South-eastern form) (Eastern Long-eared Bat)	Vulnerable	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Turnix melanogaster (Black-breasted Button-quail)	Vulnerable	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Erythrotriorchis radiatus (Red Goshawk)	Vulnerable	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Rostratula australis (Australian Painted Snipe)	Vulnerable	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Geophaps scripta scripta (Squatter Pigeon (Southern))	Vulnerable	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Pedionomus torquatus (Plains-wanderer)	Vulnerable	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Lathamus Discolor (Swift Parrot)	Endangered	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Delma torquata (Collared Delma)	Vulnerable	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Adclarkia dawsonensis (Boggomoss Snail)	Critically endangered	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Listed flora species	**EPBC Act status**				
	Eriocaulon carsonii (Salt Pipewort)	Endangered	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant	
	Xerothamnella herbacea (Herbaceous xerothamnella)	Endangered	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant	
	Tylophora linearis (Slender tylophora)	Endangered	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant	
	Microcarpaea agonis (Microcarpea)	Endangered	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant	
	Prostanthera sp. Dunmore (Dunmore mint- bush)	Vulnerable	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant	
	Acacia currani (Curly-barked Wattle)	Vulnerable	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant	
	Acacia lauta (Tara Wattle)	Vulnerable	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant	
	Calytrix gurulmundensis (Gurulmundi fringe myrtle)	Vulnerable	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant	
	Eucalyptus virens (Shiny-leaved ironbark)	Vulnerable	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant	
	*Pterostylis cobarensi*s (Cobar greenhood orchid)	Vulnerable	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant	
	Homopholis belsonii (Belson's panic grass)	Vulnerable	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant	
	Philotheca sporadica (The waxflower)	Vulnerable	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant	
	Cadellia pentastylis (Ooline)	Vulnerable	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	This species is included in the Threatened Flora Management Plan	Compliant	
	Listed migratory species	**EPBC Act status**				
	Hirundapus caudacutus (White-throated needletail)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Apus pacificus (Fork-tailed swift)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Ardea alba/Ardea modesta (Eastern great egret/great or white egret)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Bubulcus ibis/ Ardea ibis (Cattle egret)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Plegadis falcinellus (Glossy Ibis)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
	Pandion haliaetus/Pandion cristatus (Eastern Osprey)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Haliaeetus leucogaster (White-bellied sea-eagle)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Pluvialis fulva (Pacific golden plover)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Rostratula australis (Australian painted snipe)	Vulnerable / Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Gallinago hardwickii (Latham's snipe)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Limosa limosa (Black-tailed godwit)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Limosa lapponica (Bar-tailed godwit)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Numenius phaeopus (Whimbrel)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Tringa nebularia (Common greenshank)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Tringa stagnatilis (Marsh sandpiper)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Actitis hypoleucos (Common sandpiper)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Calidris acuminata (Sharp-tailed sandpiper)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Tringa glareola (Wood sandpiper)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Calidris ruficollis (Red-necked stint)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Calidris ferruginea (Curlew sandpiper)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Philomachus pugnax (Ruff)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Sterna caspia /Hydroprogne caspia (Caspian tern)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Merops ornatus (Rainbow bee-eater)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Anthochaera phrygia (Regent honeyeater)	Endangered / Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Rhipidura rufifrons (Rufous fantail)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Monarcha melanopsis (Black-faced monarch)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Myiagra cyanoleuca (Satin flycatcher)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Acrocephalus australis/A. stentoreus (Australian reed-warbler/Clamorous Reed-Warbler)	Migratory	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	This species is included in the Threatened Fauna Management Plan	Compliant	
	Note: Table 1 is derived from Volume 2: Gas Fields, Chapter 23: Matters of National Environmental Significance including Section 23.4 EPBC Act significant impact criteria assessment; Section 23.5 Threatened Species; Table 23.3 Likely occurrence of threatened flora species within the study area; Table 23.4 Likely occurrence of threatened terrestrial fauna species within the study area; Section 23.6 Listed migratory species; and Table 23.5 Likely occurrence of migratory terrestrial species within the study area of the APLNG EIS of March 2010; and from listed threatened species profiles available on the Department's website.			Note this is not mandatory and is for information only.	This is not a requirement, hence it will not be audited in terms of compliance and non-compliance.	
Table 2	**Disturbance limits for listed threatened ecological communities**					
	Ecological community	**EPBC Act status**	**Disturbance limit (ha)**	**Independent Auditor Comments**	**Compliance Finding**	
	Brigalow (*Acacia harpophylla* dominant and co-dominant)	Endangered	94.61 ha	This community is included in the Threatened Ecological Community Management Plan	Compliant	
	Weeping Myall Woodland	Endangered	0 (No disturbance authorised)	This community is included in the Threatened Ecological Community Management Plan	Compliant	

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
	The community of native species dependent on natural discharge of groundwater from the Great Artesian Basin	Endangered	0 (No disturbance authorised)	This community is included in the Threatened Ecological Community Management Plan	Compliant	
	Semi-evergreen vine thickets of the Brigalow Belt (North and South) and Nandewar Bioregions	Endangered	4.91 ha	This community is included in the Threatened Ecological Community Management Plan	Compliant	
	Natural Grasslands of the Queensland Central Highlands and the northern Fitzroy Basin	Endangered	0 (No disturbance authorised)	This community is included in the Threatened Ecological Community Management Plan	Compliant	
	Note: Table 2 is derived from the Australia Pacific LNG Environmental Offset Strategy of 16 November 2010; Volume 2: Gas Fields, Chapter 23: Matters of National Environmental Significance including Section 23.4 EPBC Act significant impact criteria assessment of the APLNG EIS of March 2010; and from listed ecological community profiles available on the Department's website.			Note this is not mandatory and is for information only.	This is not a requirement, hence it will not be audited in terms of compliance and non-compliance.	
Table 3	**Disturbance limits for listed species**					
	Species	**EPBC Act status**	**Disturbance limit (ha)**	**Indicative Habitat**	**Requirement**	**Verification Method**
	Egernia rugosa (Yakka Skink)	Vulnerable	73.44* ha of potential habitat	Open dry sclerophyll forest or woodland, Brigalow, shrublands, lancewood forests on sandy and open textured soils. Dense ground cover, cavities in soil-bound root systems of fallen trees and beneath rocks, hollow logs and animal burrows are considered to provide suitable microhabitat for this species.	This species is included in the Threatened Fauna Management Plan	Review Plans to ensure species are addressed
	Furina dunmalli (Dunmall's Snake)	Vulnerable	262.49* ha of potential habitat	Brigalow (Acacia harpophylla) forest and woodland growing on cracking black clay and clay loam soils (usually on heavy clay soils). Also known to occur in eucalypt and callitris woodland with fallen timber and ground litter.	This species is included in the Threatened Fauna Management Plan	Review Plans to ensure species are addressed
Note	* Disturbance limits for Yakka Skink and Dunmall's Snake potential habitat are derived as per the fauna habitat reduction methodology applied in Australia Pacific LNG - Fauna habitat Calculations for the Gas Fields Q-LNG01-15-RP-0014 of 16 November 2010.			Note this is not mandatory and is for information only.	This is not a requirement, hence it will not be audited in terms of compliance and non-compliance.	
Note 1	Note 1: Table 3 is derived from Volume 2: Gas Fields, Chapter 23: Matters of National Environmental Significance including Section 23.4 EPBC Act significant impact criteria assessment of the APLNG EIS of March 2010; Australia Pacific LNG - Fauna habitat Calculations for the Gas Fields Q-LNG01-15-RP-0014 of 16 November 2010; and from listed threatened species profiles available on the Department's website.			Note this is not mandatory and is for information only.	This is not a requirement, hence it will not be audited in terms of compliance and non-compliance.	
Note 2	Note 2: Habitat for species in Table 3 will be described in the management plan for each species as required under condition 8. The habitat described in Table 3 is indicative only.	Section 9.9 of the Threatened Fauna Management Plan describes habitat for the Yakka Skink. Section 9.11 of the TFMP describes habitat for Dunmall's snake.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	Check that description of habitat for species in Table 3 have been included.	Review Plans to ensure Note 2 is addressed	Compliant
Criterion 8	The management plans required under condition 7 must be developed by a qualified ecologist approved in writing by the Department and as a minimum address the following as relevant to each MNES:	The TFMP, TFLMP and TECMP were approved by the Department on 1 September 2011 as meeting conditions 5(h&p), and 7 to 10. The TFMP, TFLMP and TECMP were authored by Richard Floyd, of Unidel who were approved by the Department to undertake the development of these plans on 28 June 2011.	Letter from James Barker (SEWPaC) to Katherine Jack (Australia Pacific LNG) dated 1 September 2011. Australia Pacific LNG reference Q-LNG01-15-EA-0061 Letter from James Barker to Katherine Jack dated 28 June 2011, Company Approval or ecologists	Condition 7 plans to be prepared by qualified ecologist approved in writing by the Department and include MNES info listed below:	Review qualifications of the ecologists who have developed the plans to determine if they are appropriately qualified. Sighting letters or emails from the Dept approving people who prepared management plans.	Compliant
Criterion 8a	a. current legal status (under EPBC Act);	The TFMP, TFLMP and TECMP are structured to reflect condition 8. Each species includes the requirements of 8a.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Management Plan(s) include 8)a)	Review Plan to ensure it includes 8) a).	Compliant
Criterion 8b	b. known distribution;	The TFMP, TFLMP and TECMP are structured to reflect condition 8. Each species includes the requirements of 8b.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Management Plan(s) include 8) b)	Review Plan to ensure it includes 8) b).	Compliant
Criterion 8c	c. known species' populations and their relationships within the region;	The TFMP and TFLMP are structured to reflect condition 8. Each species includes the requirements of 8c.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012	Check Management Plan(s) include 8) c)	Review Plan to ensure it includes 8) c).	Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
Criterion 8d	d. extent of ecological community fragmentation within the region and if appropriate minimum patch size for that community;	The TECMP is structured to reflect condition 8. Each species includes the requirements of 8d.	Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Management Plan(s) include 8) d)	Review Plan to ensure it includes 8) d).	Compliant
Criterion 8e	e. to support field identification and ecological surveys, description of the relevant characteristics of the ecological community;	The TFLMP and TECMP are structured to reflect condition 8. Each species includes the requirements of 8e.	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Management Plan(s) include 8) e)	Review Plan to ensure it includes 8) e).	Compliant
Criterion 8f	f. species' biology, reproduction and description of general habitat;	The TFMP, TFLMP and TECMP are structured to reflect condition 8. Each species includes the requirements of 8f.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Management Plan(s) include 8) f)	Review Plan to ensure it includes 8) f).	Compliant
Criterion 8g	g. to support field identification and ecological surveys, description of the species' habitat, which may be described in terms of essential habitat and microhabitat, associations with geology, soils, landscape features, associations with other native fauna and/or flora or ecological communities, and specific niche habitat descriptions;	The TFMP, TFLMP and TECMP are structured to reflect condition 8. Each species includes the requirements of 8g.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Management Plan(s) include 8) g)	Review Plan to ensure it includes 8) g).	Compliant
Note	Note: Constraints mapping may be limited by available data for many species and may therefore be inadequate to map habitat requirements for planning and management purposes, or to indicate presence without on ground assessment. Condition 8(g) requires the essential components of a species' habitat to be described where relevant to support field identification and environmental constraints decision making. This should include essential habitat components for widely distributed species present in low numbers and for other species likely to be present but not often observed.	Habitat for each species in the TFMP is described in terms of general habitat, regional ecosystems and essential microhabitat features. Habitat for each species/community in the TFLMP and TECMP is provided as per condition 8g, however it does not have the same subsections as the TFMP.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Condition 8g is to support field identification and ecological surveys by describing essential components of a species' habitat	Review Plans and supporting documents to ensure they include descriptions of essential components of a species' habitat..	Compliant
Criterion 8h	h. threats to MNES relating to the development and management of land within the gas fields including from the development, operation and decommissioning of infrastructure within the gas fields; and from groundwater extraction and aquifer depressurisation, CSG water use and disposal, whether the threat is within or outside the gas field development area;	The TFMP, TFLMP and TECMP are structured to reflect condition 8. Each species includes the requirements of 8h.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Management plans for 8) h)	Review management plans developed for Condition 8 and verify that h) has been addressed.	Compliant
Note	Note: This part of a management plan may also indicate that a species or its habitat can co-exist with specific types of gas field operations.			Note this is not mandatory and is for information only.	This is not a requirement, hence it will not be audited in terms of compliance and non-compliance.	
Criterion 8i	i. relevant management practices and methods to minimise impact and recover from impact that should include:	Fauna and flora species with common management requirements have been grouped, with impact minimisation and management practices provided for each group.		Check if plans include relevant practices and methods as required	Review plans to ensure it includes 8) i).	
Criterion 8i.i)	i. site rehabilitation timeframes, standards and methods;	This is addressed in Section 1.11 of the TFMP, TFLMP and TECMP.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Plans for 8) i.) i). Note this is not a must and therefore optional.	Check if management plans include 8) i.) i).	Compliant
Criterion 8i.ii)	ii. use of sequential clearing to direct fauna away from an impact zone;	Addressed under the relevant management practices section for each grouped species in the TFMP.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	Check Plans for 8) i.) ii). Note this is not a must and therefore optional.	Check if management plans include8) i.) ii).	Compliant
Criterion 8i.iii)	iii. re-establishment of native vegetation in linear infrastructure corridors;	Monitoring of reestablishment is addressed in Section 1.12 of the TFLMP and Section 1.11 of the TECMP.	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Plans for 8) i.) iii). Note this is not a must and therefore optional.	Check if management plans include 8) i.) iii).	Compliant
Criterion 8i.iv)	iv. welfare and safe handling of fauna specimens requiring relocation from impact sites;	Addressed in Section 1.9 of the TFMP - Statement No. 9 Policy for the Translocation of Threatened Fauna in NSW - Should a relevant Queensland policy come into effect during the implementation period of this TFMP it will be used in place of the New South Wales guidelines	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	Check Plans for 8) i.) iv). Note this is not a must and therefore optional.	Check if management plans include 8) i.) iv).	Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
Criterion 8i.v)	v. handling practices for flora specimens;	Section 1.9 of the TFLMP states that Approved ecologists will have the relevant permits required to collect flora specimens in QLD and will handle the specimens in accordance with those permits. Section 3 of the TECMP states that the handling of flora specimens (seeds, cuttings or other propagules) will be done in accordance with Vallee et.al. (2004) Guidelines for the Translocation of Threatened Plants in Australia - Second Edition	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Plans for 8) i.) v). Note this is not a must and therefore optional.	Check if management plans include 8) i.) v).	Compliant
Criterion 8i.vi)	vi. translocation practices and monitoring for translocation success;	Section 3 of the TFLMP states that a propagation and rehabilitation program/management plan will be developed for any individuals of threatened flora which cannot be avoided and that have been identified as able to be translocated. Section 1.10 of the TECMP states that no translocation of TECs will be undertaken.	Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Plans for 8) i.) vi). Note this is not a must and therefore optional.	Check if management plans include 8) i.) vi).	Compliant
Criterion 8h.vii)	vii. monitoring methods including for rehabilitation success and recovery;	This is addressed in Section 1.11 of the TFMP, TFLMP and TECMP.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check Plans for 8) i.) vii). Note this is not a must and therefore optional.	Check if management plans include 8) i.) vii).	Compliant
Criterion 8j	j. surface and ground water quality and quantity requirements, including relevant downstream environmental quality parameters;	The TFMP, TFLMP and TECMP contain a cross reference to Surface Monitoring and Water Management Plan (SMWMP) (Appendix D to Q-LNG01-95-MP-0147). Groundwater monitoring is not addressed in either the TFMP or TFLMP. The TECMP refers to communities which are unlikely to be affected by project impacts on groundwater. There are no known occurrences of the community of native species dependent on natural discharge of groundwater from the Great Artesian Basin (Section 2.3 of the TECMP) and the EIS concluded that drawdown associated with gas field activities is not expected to significantly alter groundwater discharge volumes to springs located in the vicinity of the APLNG Project.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check the management plan(s) includes 8j	Review management plan(s) to ensure it has included the requirements of 8j.	Not compliant
Criterion 8k	k. reference relevant conservation advice, recovery plans, or other policies, practices, standards or guidelines relevant to MNES published or approved from time to time by the Department.	The TFMP, TFLMP and TECMP are structured to reflect condition 8. Each species includes the requirements of 8k.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check management plan(s) for 8k	Review management plan(s) to ensure it has included the requirements of 8k.	Compliant
Notes	Note 1: The management plans must include sufficient detail to inform field development decisions, ongoing management and decommissioning, and management external to the project area to minimise impacts on MNES through the life of the project. Note 2: To the extent that the requirements of condition 8 are satisfied for each species, a single plan may be prepared to address a group of species which have similar ecological characteristics and habitat needs. Other conditions also require species or ecological community management plans to be developed in certain circumstances in accordance with condition 8.	The species management plans contain detail on legal status, known distribution, known populations/relationships in the region, biology, habitat, threats and management practices. The auditors consider that this is sufficient detail to inform field decision regarding interaction with MNES on the Project.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check the management plan(s) address the requirements of Note 1	Plan(s) sighted and reviewed by auditors.	Compliant
Criterion 9 - split	9.1 Each species and ecological community management plan must be submitted for the approval of the Minister.	The species and ecological community management plans were submitted to the Department of Sustainability, Environment, Water, Population and Communities. The plans were approved by James Barker (delegate of the Minister) by letter on 1 September 2011.	Letter from James Barker (SEWPaC) to Katherine Jack (Australia Pacific LNG) dated 1 September 2011. Australia Pacific LNG reference Q-LNG01-15-EA-0061	Check each species and ecological community management plan has been submitted to the Minister for approval .	Verify that requirements of 9.1 have been met via documentation and discussion.	Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
Criterion 9 - split	9.2 Commencement of each major stage of gas field development within the project area must not occur without written approval of a plan for addressing each listed species and ecological community within the proposed area of development.	The following plans have been developed by Australia Pacific LNG and approved by the Department of Sustainability, Environment, Water, Population and Communities (SEWPaC) (now Department of the Environment): -Threatened Fauna Management Plan -Threatened Flora Management Plan -Threatened Ecological Community Management Plan Approval letter states that the Protocol meets the requirements of conditions 7, 8, 9 and 10 of EPBC 2009/4974 for Stage 1 development. Early works commenced at the gas fields on 19 October 2011, following approval of the plans on 1 September 2011. The project has not commenced the next major stage at the time of the audit.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012 Letter from James Barker (SEWPaC) to Katherine Jack (Australia Pacific LNG) dated 1 September 2011. Australia Pacific LNG reference Q-LNG01-15-EA-0061 Email from Vicki Low (Australia Pacific LNG) to Dieter Kluger, subject DSEWPaC Weekly APLNG Activity Update, dates 5 December 2011.	Check if commencement of each major stage of gas field development within the project area occurred following written approval of a plan for each listed species and ecological community within the proposed area of development.	Verify the commencement of gas field development occurred in accordance with 9.2 via written letters, emails, documentation with the Department.	Compliant
Criterion 9 - split	9.3 The proponent may undertake activities that are critical to commencement that are associated with mobilisation of plant and equipment, materials, machinery and personnel prior to the start of development only if such activities will have no adverse impact on MNES, and only if the proponent has notified the Department in writing before an activity is undertaken.	Auditors advised that no significant works were undertaken prior to the start of development. Pre-development works were limited to activities such as field scouting.		Check the Proponent has undertaken activities critical to commencement that are associated with mobilisation of plant and equipment, materials, machinery and personnel only if it is determined that the activities have no adverse impact on MNES and only once the Department has been notified in writing.	Determine if activities were undertaken in accordance with the requirements of 9.3 via review of documentation, discussions with stakeholders etc.	Compliant
Criterion 9 - split	9.4 Approved species and ecological community management plans must be implemented.	Refer to SSMP Checklist	Refer to SSMP Checklist	Approved species and ecological community management plans must be implemented.	1. Obtain evidence to show that key elements of each approved species and ecological community management plan have been implemented (refer to management plan checklist). 2. Conduct site visits to determine if species and ecological community management plans have been implemented.	Refer to Condition 8 Implementation checklist
Criterion 10 - split	10.1 The proponent must establish a program for routine review of the species and ecological community management plans to be undertaken by a qualified ecologist approved by the Department (with other experts as appropriate)	Section 1.4 of the TFMP, TFLMP, and TECMP states that the plan applies to each of the gas field development stages and will be reviewed every five years in alignment with the design of the five year staging for the gas field development. The five year review will be undertaken earlier if the staging timeframe is shortened or if new studies, management plans, or legislation come into effect that may be relevant.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check management plans include a program for routine review to be conducted by a qualified ecologist approved by the Department (with other experts as appropriate)	1. Obtain evidence to determine if the species and ecological community management plans are routinely reviewed. 2. by a qualified ecologist approved by the Department.	Compliant
Criterion 10 - split	10.2 Review must take into account any new information available to the proponent, including any information and advice provided by Commonwealth or Queensland Government agencies, or available from other CSG proponents.	Section 1.4 of the TFMP, TFLMP, and TECMP states that the five year review will be undertaken earlier if the staging timeframe is shortened or if new studies, management plans, or legislation come into effect that may be relevant.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Evidence to verify revisions take into account any new information available to the proponent including information provided by government agencies, fellow CSG companies.	Review evidence to determine if new information is taken into account by the Proponent during the review process.	Compliant
Criterion 11	11. The Minister may require, by a request in writing, the periodic review of the species and ecological community management plans, either by the Department; or alternatively by an independent qualified ecologist, or other experts, approved by the Department.	Australia Pacific LNG has advised that no request for a review has been made by the Minister.		Check if such a request to has been made. Determine if the reviewer was approved by the Department.	1. Check to see if the Minister has requested a periodic review of the species and ecological community management plans. 2. Review evidence to determine if the reviewer was approved by the Department.	Not applicable
Criterion 12 - split	12.1 Independent review of plans will be at the financial expense of the proponent.	Australia Pacific LNG has advised that no independent review had been required at the time of the audit.		If appropriate, check that the financial expense of the independent review was borne by the Proponent.	If appropriate, review evidence to determine if any reviews of the species and ecological community management plans were at the financial expense of the Proponent.	Not applicable
Criterion 12 - split	12.2 Once independently reviewed, plans must be submitted for written approval by the Department.	Australia Pacific LNG has advised that no independent review had been required at the time of the audit.		Check that plans are submitted for written approval by the Department.	Review evidence to determine if independently reviewed plans were submitted to the Department for approval.	Not applicable
Criterion 12 - split	12.3 Approved plans must be implemented.	Refer to Condition 8 Implementation Checklist	Refer to Condition 8 Implementation Checklist	Check that approved plans are implemented.	1. Obtain evidence to show that key elements of each approved species and ecological community management plan have been implemented (refer to management plan checklist). 2. Conduct site visits to determine if species and ecological community management plans have been implemented.	
Criterion 13	13. If an impact occurs (which may include a presumed impact where the species is presumed to be present) to a MNES during gas field development, operation, or decommissioning the proponent must:	Disturbance to TECs are recorded as disturbances to MNES. Disturbance to potential habitat for listed fauna is not recorded and it is understood this is the subject of ongoing negotiations between Origin and the Department.				
Criterion 13a	a. record the impact by reference to:			Document the impact:		
Criterion 13a.i)	i. the location, specific site and type of infrastructure or activity;	The location, specific site and type of activity is recorded in a spreadsheet (sighted). This is linked to GIS data, with the corresponding figures viewed by the auditors.	TEC disturbance spreadsheet sighted, including GIS register and related figures.	Evidence to verify records include information specified in Condition 13) a) i)	Review evidence to determine if impacts to MNES during gas field development, operation or decommissioning have been recorded in accordance with 13) a) i).	Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
Criterion 13a.ii)	ii. each MNES subject to disturbance;	Disturbance to TECs are recorded as disturbances to MNES. Disturbance to potential habitat for listed fauna is not recorded and it is understood this is the subject of ongoing negotiations between Origin and the Department.	TEC disturbance spreadsheet sighted, including GIS register and related figures.	Evidence to verify records include information specified in Condition 13) a) ii)	Review evidence to determine if impacts to MNES during gas field development, operation or decommissioning have been recorded in accordance with 13) a) ii).	Not compliant
Criterion 13a.iii)	iii. the related site assessment or field ecological survey documentation and recommendations, or the decision that the particular MNES was presumed to be present;	The ecology assessments and pre-clearance surveys are not referenced specifically against the record of disturbance.	TEC disturbance spreadsheet sighted, including GIS register and related figures.	Evidence to verify records include information specified in Condition 13) a) iii)	Review evidence to determine if impacts to MNES during gas field development, operation or decommissioning have been recorded in accordance with 13) a) iii).	Not compliant
Criterion 13a.iv)	iv. the disturbance limit set under condition 25;	Disturbance to TECs are recorded as disturbances to MNES. Disturbance to potential habitat for listed fauna is not recorded and it is understood this is the subject of ongoing negotiations between Origin and the Department.	TEC disturbance spreadsheet sighted, including GIS register and related figures.	Evidence to verify records include information specified in Condition 13) a) iv)	Review evidence to determine if impacts to MNES during gas field development, operation or decommissioning have been recorded in accordance with 13) a) iv).	Not compliant
Criterion 13a.v)	v. the total area of actual disturbance;	Disturbance to TECs are recorded as disturbances to MNES. Disturbance to potential habitat for listed fauna is not recorded and it is understood this is the subject of ongoing negotiations between Origin and the Department.	TEC disturbance spreadsheet sighted, including GIS register and related figures.	Evidence to verify records include information specified in Condition 13) a) v)	Review evidence to determine if impacts to MNES during gas field development, operation or decommissioning have been recorded in accordance with 13) a) v).	Not compliant
.	vi. the remaining disturbance limit for each affected MNES;	Disturbance to TECs are recorded as disturbances to MNES. Disturbance to potential habitat for listed fauna is not recorded and it is understood this is the subject of ongoing negotiations between Origin and the Department.	TEC disturbance spreadsheet sighted, including GIS register and related figures.	Evidence to verify records include information specified in Condition 13) a) vi)	Review evidence to determine if impacts to MNES during gas field development, operation or decommissioning have been recorded in accordance with 13) a) vi).	Not compliant
Criterion 13a.vii)	vii. the reasons for the decision including justification for the action taken, description of the efforts taken to avoid impact, and explanation why other constraints might justify the impact on MNES;	Justification for phase one has been recorded in squad checks (gated design refinement). Future disturbance justification is to be recorded in a TEC drawdown approval process. Squad checks sighted for the following infrastructure: -CMN153-1 -CMN170-2 -CMN236-2 -CMN280-1 -CMN263-3 -CMN281-3 -CMN153 -CMN194 -CMN255 -CMN280	EPBC squad check justification spreadsheet for TEC disturbance in Combabula pressure zone 2A, Golden RG, Griffin BC, Pressure Zones 0A-4 and 1A-2 (Location visited during site audit).	Evidence to verify records include information specified in Condition 13) a) vii)	Review evidence to determine if impacts to MNES during gas field development, operation or decommissioning have been recorded in accordance with 13) a) vii).	Compliant
Criterion 13a.viii)	viii. actions and commitments by the proponent to remediate, rehabilitate, or make good any unauthorised disturbance; and	Auditors advised that no unauthorised disturbance has occurred to matters of national environmental significance. A compliance register was sighted by the auditors, however this was limited to incidents open at the time of the audit.	Extract from OCIS Compliance Register, most recent entry from February 2014.	Evidence to verify records include information specified in Condition 13) a) viii)	Review evidence to determine if impacts to MNES during gas field development, operation or decommissioning have been recorded in accordance with 13) a) viii).	Compliant
Note	Note: This condition applies to any adverse impact on MNES, whether or not a disturbance limit has been set, and whether or not the impact has been decided by the proponent under the Protocol based on other physical constraints.			This is for information and clarification purposes.	This is for information and clarification purposes.	
Criterion 13b	b. record the information to a standard which can be independently audited.	The TEC spreadsheet incorporating GIS attributes is auditable for disturbance calculations. The justification for disturbance is recorded separately. Documentation for two properties where TEC disturbance was observed was requested for review by the auditors.	EPBC squad check justification spreadsheet for TEC disturbance in Combabula pressure zone 2A, Golden RG, Griffin BC, Pressure Zones 0A-4 and 1A-2 (Location visited during site audit).	Evidence to verify information was available and of a standard to allow it to be independently audited.	Review evidence to determine if information is clear, available, traceable and recorded in a timely manner etc. to allow it to be independently audited.	Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
EPBC 2009/4974 **Condition 20**	Approval and Review of Protocol - The Protocol must be submitted for the approval of the Minister. Commencement of gas field development must not occur without written approval of the Protocol. The approved Protocol must be implemented.					
Criterion 20 - split	Approval and Review of Protocol - 20.1 The Protocol must be submitted for the approval of the Minister.	The Protocol was submitted to the Department of Sustainability, Environment, Water, Population and Communities. The Protocol was approved by James Barker (delegate of the Minister) by letter on 1 September 2011.	Letter from James Barker (SEWPaC) to Katherine Jack (Australia Pacific LNG) dated 1 September 2011. Australia Pacific LNG reference Q-LNG01-15-EA-0061	Check that the Protocol was submitted to the Minister for approval.	Review evidence to determine if the Protocol was submitted to the Minister for approval.	Compliant
Criterion 20 - split	20.2 Commencement of gas field development must not occur without written approval of the Protocol.	The Protocol was issued as final on 31 August 2011. No amendments to the Protocol had been made at the time of the audit. The Protocol was approved by letter on 1 September 2011. Early works commenced at the gas fields on 19 October 2011.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011 Email from Vicki Low (Australia Pacific LNG) to Dieter Kluger, subject DSEWPaC Weekly APLNG Activity Update, dates 5 December 2011. Letter from James Barker (SEWPaC) to Katherine Jack (Australia Pacific LNG) dated 1 September 2011. Australia Pacific LNG reference Q-LNG01-15-EA-0061	Check if commencement of gas field development occurred following written approval of the Protocol.	Sighting Protocol and approval letter from the Dept, with comparison between when commencement started and approval was received.	Compliant
Criterion 20 - split	20.3 The approved Protocol must be implemented.	Refer to Protocol Checklist	Refer to Protocol Checklist	Check that approved Protocol is implemented.	1. Obtain evidence to show that the commitments contained within the Protocol have been implemented. 2. Conduct site visits to determine if Protocol has been implemented.	
Criterion 21 - split	Constraints Planning and Field Development Protocol Review - 21.1 The Protocol and related plans must be reviewed and updated by the proponent to take into account the findings of Cumulative Impact Assessment Reports required by the Queensland Government before each major stage of the proponent's gas field development; or following a written request from the Department.	This requirement is noted in Section 9 of the Protocol. The gas field is currently in the first stage (first five years) of development. No updates to the Protocol have been made, and no requests have been received from the Department.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check that the Protocol and related plans were reviewed and updated by the proponent to take into account the findings of the Cumulative Impact Assessment Report before each major stage of the proponent's gas field development; or following a written request from the Department.	Review evidence to determine if the Protocol and related plans were reviewed and updated to take into account the requirements of 21.1	Not applicable
Criterion 21 - split	21.2 Reviewed and updated Protocols and plans must be submitted for the Minister's written approval.	No updates to the Protocol have been made, and no requests have been received from the Department.		Check that reviewed and updated Protocols and plans were submitted for the Minister's written approval.	Review evidence to determine if the reviewed and updated Protocol and plans were submitted to the Minister for approval.	Not applicable
Criterion 21 - split	21.3 Once approved, updated Protocols and plans must be implemented.	No updates to the Protocol have been made. Refer to condition 20 for assessment of implementation of the current Protocol.		Check that approved Protocols and plans were implemented.	Review evidence to determine if the current approved versions of the Protocol and ecological community management plan(s) were implemented.	Not applicable
Note 1	Note 1: relevant studies include the Queensland Water Commission Cumulative Groundwater Model for the Surat and South Bowen Basin and findings of the CSG Industry Monitoring Group (CIMG).			This is for information and clarification purposes only.	This is for information and clarification purposes only.	
Note 2	Note 2: The review required following completion of the Cumulative Impact Assessment Report required by the Queensland Government may be done after approval of the Protocol. The Department may seek review of the Protocol to align with Queensland Government requirements to support efficiency and avoid duplication.			This is for information and clarification purposes only.	This is for information and clarification purposes only.	
Criterion 22 - Split	22.1 - The proponent's review of the Protocol must take into account all relevant studies, policies, standards, guidelines and advice relating to CSG activity published or provided to the proponent by the Commonwealth or Queensland governments.	This requirement is noted in Section 9 of the Protocol. The Protocol approved by the Department in 2011 is the current Protocol. No reviews have been required, either by request from the Department or prior to the next stage of development.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Evidence to verify that review processes have been fulfilled taking into account relevant Commonwealth and Queensland government information as required by 22.1.	Evaluation of evidence to determine the requirements of 22.1 are covered.	Not applicable
Criterion 22 (Split)	22.2 - The proponent's review of the Protocol must take into account all relevant studies, policies, standards, guidelines and advice relating to CSG activity published or provided to the proponent by other proponents undertaking similar activities, or published or provided by other parties, including any findings of an audit against conditions, or plans or other documentation required under the conditions of this approval	This requirement is noted in Section 9 of the Protocol. The Protocol approved by the Department in 2011 is the current Protocol. No reviews have been required, either by request from the Department or prior to the next stage of development.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Evidence to verify that review process has been fulfilled taking into account relevant information published or provided by other proponents undertaking similar activities or by other parties, or findings of audits against conditions, plans or documents required under the conditions of this approval.	Discussions with relevant personnel, review of correspondence and revised Protocols to ensure information in 22.2 has been taken into account.	Not applicable
Criterion 23 - split	23.1 The Department may require, by a request in writing, that the Protocol and related plans be revised or amended before approval.	The Protocol was submitted to the Department of Sustainability, Environment, Water, Population and Communities for review as Revision 1 on 5 August 2011. Revision 2 of the Protocol (Final issue) is dated 31 August 2011, and approved by the Minister's delegate on 1 September 2011. Auditors advised that no requests have been made by the Department for the Protocol and related plans to be revised or amended.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011 Letter from James Barker (SEWPaC) to Katherine Jack (Australia Pacific LNG) dated 1 September 2011. Australia Pacific LNG reference Q-LNG01-15-EA-0061	Check if the Department required the Protocol and / or related Plans to be revised or amended before approval.	Verify if requirements of 23.1 have been meet if any request has been made in writing by the Dept.	Not applicable
Criterion 23 - split	23.2 Any such request must be acted on within the time frame specified.	Auditors advised that no requests have been made by the Department for the Protocol and related plans to be revised or amended.		Check that the Department's request was acted on by the proponent within the time frame specified.	1. Determine if the Department's written request specifies a time frame within which the Protocol or related Plans should be revised and updated. 2. Determine if the proponent complied with the time frames specified where relevant.	Not applicable

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
Criterion 24 - split	24.1 The approved Protocol must be incorporated into the proponent's management procedures, operational plans and other relevant documentation and kept current for the life of the project.	Section 9 of the Protocol states that the approved Protocol will be incorporated into management procedures, operational plans and documentation and kept current for the life of the project. The Protocol is an overarching document which is included in infrastructure location decisions. A description of how the Protocol related to the project is provided in the audit report.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011	Check that the approved Protocol has been incorporated into relevant documentation including but not limited to management plans, procedures, operational plans etc. and kept current for the life of the project.	Evaluation of evidence including: • a review of a sample of management procedures, operational plans & other relevant documents to confirm these are in accordance with the approved Protocol; • a review the above documents to ensure that procedures are in place to maintain currency with any relevant updates resulting from changes to the Protocol; and • a review of a sample of operational documents to confirm relevant updates resulting from changes to the protocol.	Compliant
Criterion 24 - split	24.2 The approved Protocol must be kept current for the life of the project.	Section 9 of the Protocol states that the approved Protocol will be incorporated into management procedures, operational plans and documentation and kept current for the life of the project. The Protocol has not been required to be reviewed under Conditions 20-23. The current version of the Protocol is Revision 2, as approved by the Minister's delegate on 1 September 2011.	Environmental Constraints Planning and Field Development Protocol Q-LNG01-15-MP-0109 Revision 2 31 August 2011 Letter from James Barker (SEWPaC) to Katherine Jack (Australia Pacific LNG) dated 1 September 2011. Australia Pacific LNG reference Q-LNG01-15-EA-0061	Check that the approved Protocol has been kept current for the life of the project to date.	Check that the Protocol has been reviewed and updated as required by Conditions 20-23.	Compliant
Criterion 25 split	The maximum disturbance limits in Table 2 (below) apply to authorised unavoidable adverse impacts on MNES within the project area as a result of exploration, development, operation and decommissioning within the project area illustrated in Attachment 1, and external to it, ('whole of project' disturbance limits) and all associated activities.	Disturbance to TECs are recorded as disturbances to MNES. Disturbance to potential habitat for listed fauna is not recorded.	TEC disturbance spreadsheet sighted, including GIS register and related figures.	Check that the disturbance to MNES is within the maximum disturbance limits in Table 2 and Table 3 listed below:	Review of records and clearing data to verify maximum disturbance areas in line with limits detailed in tables 2 and 3 below.	Undetermined
Table 2	**Disturbance limits for listed threatened ecological communities**					
	Ecological community	**EPBC Act status**	**Disturbance limit (ha)**			
	Brigalow *(Acacia harpophylla dominant and co-dominant)*	Endangered	94.61 ha	Check these disturbance limits	Verify disturbance limits.	Compliant
	Weeping Myall Woodland	Endangered	0 (No disturbance authorised)	Check these disturbance limits	Verify disturbance limits.	Compliant
	The community of native species dependent on natural discharge of groundwater from the Great Artesian Basin	Endangered	0 (No disturbance authorised)	Check these disturbance limits	Verify disturbance limits.	Compliant
	Semi-evergreen vine thickets of the Brigalow Belt (North and South) and Nandewar Bioregions	Endangered	4.91 ha	Check these disturbance limits	Verify disturbance limits.	Compliant
	Natural Grasslands of the Queensland Central Highlands and the northern Fitzroy Basin	Endangered	0 (No disturbance authorised)	Check these disturbance limits	Verify disturbance limits.	Compliant
	Note: Table 2 is derived from the Australia Pacific LNG Environmental Offset Strategy of 16 November 2010; Volume 2: Gas Fields, Chapter 23: Matters of National Environmental Significance including Section 23.4 EPBC Act significant impact criteria assessment of the APLNG EIS of March 2010; and from listed ecological community profiles available on the Department's website.			This is for information only.	This is for information only.	
Table 3	**Disturbance limits for listed species**	**EPBC Act status**	**Disturbance limit (ha)**	**Indicative habitat**	**Requirement**	**Verification Method**
	Egernia rugosa (Yakka Skink)	Vulnerable	73.44* ha of potential habitat	Open dry sclerophyll forest or woodland, Brigalow, shrublands, lancewood forests on sandy and open textured soils. Dense ground cover, cavities in soil-bound root systems of fallen trees and beneath rocks, hollow logs and animal burrows are considered to provide suitable microhabitat for this species.	Verify disturbance limits.	Undetermined
	Furina dunmalli (Dunmall's Snake)	Vulnerable	262.49* ha of potential habitat	Brigalow (Acacia harpophylla) forest and woodland growing on cracking black clay and clay loam soils (usually on heavy clay soils). Also known to occur in eucalypt and callitris woodland with fallen timber and ground litter.	Verify disturbance limits.	Undetermined
Note	* Disturbance limits for Yakka Skink and Dunmall's Snake potential habitat are derived as per the fauna habitat reduction methodology applied in Australia Pacific LNG - Fauna habitat Calculations for the Gas Fields Q-LNG01-15-RP-0014 of 16 November 2010.			This is for information purposes only	This is for information purposes only.	
Note 1	Note 1: Table 3 is derived from Volume 2: Gas Fields, Chapter 23: Matters of National Environmental Significance including Section 23.4 EPBC Act significant impact criteria assessment of the APLNG EIS of March 2010; Australia Pacific LNG - Fauna habitat Calculations for the Gas Fields Q-LNG01-15-RP-0014 of 16 November 2010; and from listed threatened species profiles available on the Department's website.					

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
Note 2	Note 2: Habitat for species in Table 3 will be described in the management plan for each species as required under condition 8. The habitat described in Table 3 is indicative only.	Section 9.9 of the Threatened Fauna Management Plan describes habitat for the Yakka Skink. Section 9.11 of the TFMP describes habitat for Dunmall's snake.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012)	Habitat for species in Table 3 to be described in the management plan as required by condition 8.	Verify information required by Note 2 has been included in plans as required by condition 8.	Compliant
Criterion 26	Impact on Narran lakes - The Gasfield activities must not have a significant impact on the Narran Lakes Wetlands.	Section 6.2 of the CWMMP states that "concluded that it would be unlikely for treated CSG water to be transmitted to an extent that it could affect Narran Lakes. This was further confirmed with additional modelling completed by RPS in 2012. Appendix C - RPS (ex Conics) Assessment of Impact on Narran Lakes Wetland. Since there is no potential to impact on MNES associated with Narran Lakes, it is not considered necessary to develop threshold values." A letter from RPS to Origin Energy states that "there is likely to be minimal (if any) flow of CSG water from the APLNG project (and hence no impact) into Narran Lakes and certainly not Gwydir Wetlands."	Australia Pacific LNG Upstream Phase 1 Stage 2 Coal Seam Gas Water Monitoring and Management Plan: Surface Water Monitoring and Management Q-LNG01-95-MP-1040, Revision 6, 12 March 2014). Letter from David Carberry (RPS) to Robert Kane (Origin Energy), dated 9 June 2010, subject Proposed APLNG Discharge and Impact on Narran Lakes and Gwydir Wetlands	Identify potential impacts to the area and management plan mitigation measures.	1. Obtain & review evidence of any Management plan and site specific monitoring carried out; and 2. review of OSIS records	Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
EPBC Approval Condition 5	Protocol imposed constraints and assessment requirements -					
	5. The Protocol must:					
	a. classify the following as being within the proponent's sensitivity categories 1 to 4 (or should the proponent's classification be revised, equivalent high environmental constraints class): Note: The commitments or undertakings that require implementing are to be separately identified and measured in this checklist.			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	
	i. all listed threatened ecological communities;			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	
	ii. all listed flora species; and			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	
	iii. those listed threatened and migratory fauna species habitats as identified in management plans required under these conditions, which where relevant may be described in terms of specific niche habitat types;			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	
	b. include constraints mapping for sensitivity category 1-7 as described in the proponent's Environmental Impact Statement;			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	
	c. require pre-clearance site assessments of sensitivity category 1-4 by an approved suitably qualified ecologist;	Four preclearance surveys were sighted: -Griffin BC pressure zones 1A-3 (Ausecology) -Potters Flat (Boobook) -Crosby Property (New Ground) -Keys Property (AMEC) It is not clear from these pre-clearance surveys whether the sites are located in sensitivity categories 1-4. It was unclear if Ausecology, or their ecologists are approved. It is also unclear if Griffin BC pressure zones 1A-3 include sensitivity categories 1-4, and therefore many not require an approved ecologist. Boobook received company approval to undertake pre-clearance surveys on 28 June 2011. The Crosby property survey does not state specific ecologists. Noted that approval for nine New Ground ecologists has been sighted from 18 February 2013. This approval is dated after submission of the survey report as Revision 0 on 12 February 2013. Dan Rollison signed off the report and has previously been approved by the Department on 11 May 2011. An ecology assessment report refers to New Ground approved to undertake ecological surveys by DSEWPaC on the 28/06/2011, however evidence of this approval was not provided during the audit. AMEC ecologists, James Gubby and Trevor Meers, approved for terrestrial flora and terrestrial fauna respecitively, on 31 July 2012.	Australia Pacific LNG preclearance ecological assessment: Griffin BC pressure zone 1A-3, Ausecology, Revision 0, November 2013 Pre-clearance survey report: R. Golden 'Potters Flat', Lot 21 on Plan AB47, Lot 22 on Plan AB47 and Lot 24 on Plan AB142, Combabula Tenement. Boobook, Revision 0, 23 January 2014 Preclearance Survey of: Lot 7 on plan RG18, Lot 19 on plan RG189, Lot 20 on plan RG18, and Lot 38 on plan RG68, AMEC, Revision 0, February 2013 Pre-clearing Survey in Relation to Lot 18 SP133341 (Crosby Property), New Ground, 12 February 2013 Letter from James Barker to Katherine Jack, Company approval of ecologists: EPBC2009/4974, EPBC 2009/4976 and EPBC 2009/4977, dated 28 June 2011 Letter from Shane Gaddes to Rob Ully, Approval of suitably qualified ecologists under the EPBC Act approvals 2007/4974, 2008/4976 and 2008/4977. Dated 13 September 2013. Letter from Shane Gaddes to Rob Ully, Approval of suitably qualified ecologists under the EPBC Act approvals 2007/4974, 2008/4976 and 2008/4977. Dated 18 February 2013. Letter from James Barker to Katherine Jack, dated 11 May 2011	Evidence to verify this element has been implemented.	Review of assessment reports to ensure they have taken this into account.	Undetermined
	d. require pre-clearance site assessments of sensitivity category 5-7 by a suitably qualified environmental officer;			Evidence to verify this element has been implemented.	Review of assessment reports to ensure they have taken this into account.	
	e. for any MNES identified following an assessment under 5d, require review of those pre-clearance site assessments by a suitably qualified ecologist;			Evidence to verify this element has been implemented.	Review of assessment reports to ensure they have taken this into account.	

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
	f. update constraints mapping with results of any pre-clearance site assessments which confirm presence of MNES	Following discussion with Australia Pacific LNG and review of pre-clearance assessment methodology, the auditors understand that results of pre-clearance site assessments (including GIS data recorded using a trimble in the field) is provided to update constraints mapping prior to design finalisation. See audit report for detail on this process.	Australia Pacific LNG preclearance ecological assessment: Griffin BC pressure zone 1A-3, Ausecology, Revision 0, November 2013 Pre-clearance survey report: R. Golden 'Potters Flat', Lot 21 on Plan AB47, Lot 22 on Plan AB47 and Lot 24 on Plan AB142, Combabula Tenement. Boobook, Revision 0, 23 January 2014 Preclearance Survey of: Lot 7 on plan RG18, Lot 19 on plan RG189, Lot 20 on plan RG18, and Lot 38 on plan RG68, AMEC, Revision 0, February 2013 Pre-clearing Survey in Relation to Lot 18 SP133341 (Crosby Property), New Ground, 12 February 2013	Evidence to verify this element has been implemented.	Review of constraints mapping and site inspection to ensure they have taken this into account.	Compliant
	g. require the documentation of all planning decisions and pre-clearance site assessments and field ecological surveys in proposed gas fields development areas where sensitivity category 1-4 is mapped, likely or found;	Planning decisions for infrastructure placement are recorded in Environmental Constraints Assessments (ECAs). ECAs for the following locations were sighted: -Gathering - Combabula, Golden, R -Gathering - Combabula, Griffin BC Zone 1A-2 -Gathering - Combabula, Griffin BC Zone 0A-4 -Gas Processing Facility - Combabula Pre-clearance assessments are documented separately, with the results used in planning decisions.	Australia Pacific LNG Gathering - Combabula - Golden, R Environmental Constraints Assessment, Q-4200-15-RP-1156, Revision 0, 16 September 2013 Combabula - Gas Processing Facility Environmental Constraints Assessment, Q-4200-15-RP-0001, Revision: 0, 9 July 2013 Australia Pacific LNG Gathering - Combabula, Griffin BC Zone 1A-2 Environmental Constraints Assessment, Q-4200-15-RP-1092, Revision: 0, 9 May 2013 Australia Pacific LNG Gathering - Combabula, Griffin BC Zone 0A-4 Environmental Constraints Assessment, Q-4200-15-RP-1093, Revision: 0, 7 March 2013	Evidence to verify this element has been implemented.	Review of documentation to ensure requirements of g are included.	Compliant
	h. implement species management plans (as required in condition 7);			Refer Species Management Plan checklist.	Refer Species Management Plan checklist.	
	i. calculate disturbance as required in condition 13;	Refer to condition 13 for compliance assessment		Evidence to verify this element has been implemented.	Check disturbance limits as per Condition 25	
	j. take into account all current survey data and available information and maps of all MNES relevant to the project area as described within environmental sensitivity category 1-4; and	The environmental workpacks contain recent mapping, updated from groundtruthing surveys. These mapping suites contain current survey data and sensitivity categories.	Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014 Combabula Gathering System – Golden RG – Field Services Group (FSG), Drilling and Completions Environmental Workpack, Q-4200-15-WP-1044 Revision: 0, 16 April 2014 Combabula Gathering System – Golden & Wathen Zones 2A – Field Services Group (FSG) and Drilling Environmental Workpack, Q-4200-15-WP-1019 Revision: 0, 12 December 2012 Combabula Gathering System, Griffin BC, Pressure Zones 0A-4 & 1A-2 Environmental Workpack, Q-4200-15-WP-1027 Revision: 0, 31 May 2013 Reedy Creek Water Treatment Facility (WTF) - Lots 72WV619, 29WV630, 30WV630 and 34WV774 Environmental Workpack, Q-4240-15-WP-0001 Revision: 2, 21 November 2012 Reedy Creek Gas Processing Facility (GPF) Construction Environmental Workpack, Q-4231-15-WP-0001 Revision: 1, 16 November 2012 Combabula – Gas Processing Facility Earthworks, Road Works and Drainage Environmental Workpack, Q-4200-15-WP-1005 Revision: 2, 28 January 2014	Evidence to verify this element has been implemented.	Review of all current survey data and available information & maps of all MNES relevant to the project area to ensure they have taken this into account.	Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
	k. require the pre-clearance site assessments and field ecological surveys to identify and assess options relating to development impacts on MNES and provide recommendations to inform the development of the project area;	Pre-clearance surveys sighted each include a recommendations sections with relation to MNES flora and fauna management.	Australia Pacific LNG preclearance ecological assessment: Griffin BC pressure zone 1A-3, Ausecology, Revision 0, November 2013 Pre-clearance survey report: R. Golden 'Potters Flat', Lot 21 on Plan AB47, Lot 22 on Plan AB47 and Lot 24 on Plan AB142, Combabula Tenement. Boobook, Revision 0, 23 January 2014 Preclearance Survey of: Lot 7 on plan RG18, Lot 19 on plan RG189, Lot 20 on plan RG18, and Lot 38 on plan RG68, AMEC, Revision 0, February 2013 Pre-clearing Survey in Relation to Lot 18 SP133341 (Crosby Property), New Ground, 12 February 2013	Evidence to verify this element has been implemented.	Review of pre-clearance site assessment reports and field ecological surveys to ensure they have taken this into account.	Compliant
	Note: The proponent's approach to sensitivity mapping relates to impact avoidance and mitigation as described in volume 2, chapter 23 of the proponent's Environmental Impact Statement (publicly released 20 march 2010). The indicative sensitivity categories described in the EIS are:			See below	See below	
	Category 1: Extremely sensitive: Siting of infrastructure within these areas will be avoided.	BAAM sensitivity category mapping used in the EIS is ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase).	Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014	Evidence to verify this element has been implemented.	Review of reports & Site inspection.	Compliant
	Category 2: Highly Sensitive: Infrastructure will only be located within or in proximity to existing cleared and disturbed areas to reduce fragmentation; Limited clearing (if necessary for incremental expansion of existing disturbance) for construction to be rehabilitated prior to			Evidence to verify this element has been implemented.	Review of reports & Site inspection.	
	Category 3: Sensitive: Clearing only for linear infrastructure and well leases. Non-linear infrastructure to be located within or in proximity to existing cleared and disturbed areas. Disturbed areas not required for ongoing operation to be rehabilitated prior to operation.			Evidence to verify this element has been implemented.	Review of reports & Site inspection.	
	Category 4: Neutral: Clearing for linear and non-linear infrastructure is to minimise edge effects where possible.			Evidence to verify this element has been implemented.	Review of reports & Site inspection.	
	Category 5: Robust: Clearing for infrastructure, although hollow-bearing trees and habitat connectivity, particularly along watercourses, to be			Evidence to verify this element has been implemented.	Review of reports & Site inspection.	
	Category 6 and 7: Cleared: Siting of infrastructure >100m from edges of categories 2-5 and >200m from category 1.			Evidence to verify this element has been implemented.	Review of reports & Site inspection.	
	l. to avoid direct and indirect adverse impacts on MNES, including fragmentation and edge effects, provide that proposed infrastructure is located in accordance with the following:	BAAM sensitivity category mapping used in the EIS are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. BAAM mapping for the 2A work pack indicates wells sited in the buffer around category 1. BAAM mapping for the Griffin BC work pack indicates wells sited in in category 5 only. BAAM mapping for the RG Golden work pack indicates wells sited in the buffer around categories 2 to 5, and within category 5.	Combabula Gathering System – Golden RG – Field Services Group (FSG), Drilling and Completions Environmental Workpack, Q-4200-15-WP-1044 Revision: 0, 16 April 2014 Combabula Gathering System – Golden & Wathen Zones 2A – Field Services Group (FSG) and Drilling Environmental Workpack, Q-4200-15-WP-1019 Revision: 0, 12 December 2012 Combabula Gathering System, Griffin BC, Pressure Zones 0A-4 & 1A-2 Environmental Workpack, Q-4200-15-WP-1027 Revision: 0, 31 May 2013	See below	See below	Compliant
	When siting exploration and production wells:					
	i) avoid development within sensitivity category 1 unless authorised in writing by the Department;			Evidence to verify this element has been implemented.	Undertake review of approval documents and undertake site inspection to confirm implementation.	
	ii) avoid development within sensitivity category 2-4, unless the location within any of these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable;			Evidence to verify this element has been implemented.	Undertake review of approval documents and undertake site inspection to confirm implementation.	
	iii) where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site the wells in proximity to cleared areas, or in areas of lower ecological condition such as previously disturbed or degraded areas; and			Evidence to verify this element has been implemented.	Undertake review of approval documents and undertake site inspection to confirm implementation	
	iv) where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist.			Evidence to verify this element has been implemented.	Undertake review of approval documents and undertake site inspection to confirm implementation.	
	Note: Directional drilling and multiple drill holes from one well pad are options to avoid well site and related infrastructure disturbance to			This is not mandatory.	This is not mandatory.	
	When siting non- linear infrastructure:	BAAM sensitivity category mapping used in the EIS	Reedy Creek Water Treatment Facility (WTF) - Lots 72WV619, 29WV630,			Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
	i) avoid development within sensitivity category 1 unless authorised in writing by the Department;	are ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. Work packs reviewed for Combabula GPF, Reedy Creek GPF and Reedy Creek WTF. Combabula GPF located in Category 5, and Category 2-5 buffer. Reedy Creek GPF located primarily in cleared area, with an overlap with Category 2-5 buffer. Reedy Creek WTF located within cleared area and does not overlap with any sensitivity categories.	30WV630 and 34WV774 Environmental Workpack, Q-4240-15-WP-0001 Revision: 2, 21 November 2012 Reedy Creek Gas Processing Facility (GPF) Construction Environmental Workpack, Q-4231-15-WP-0001 Revision: 1, 16 November 2012 Combabula – Gas Processing Facility Earthworks, Road Works and Drainage Environmental Workpack, Q-4200-15-WP-1005 Revision: 2, 28 January 2014	Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation.	
	ii) avoid development within sensitivity category 2-4, unless the location within any of these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable;			Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation.	
	iii) where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site infrastructure in or approximate to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas; and			Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation.	
	iv) where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist.			Evidence to verify this element has been implemented.	Complete review of relevant documents and written advice from ecologists and undertake site inspection to confirm implementation.	
	When siting linear infrastructure:	BAAM sensitivity category mapping used in the EIS is ground-truthed following preliminary design/alignment to provide on ground input into environmental constraints. The site visit conducted identified linear infrastructure (gathering network) within category 5 (Pressure Zone 2A) and in sensitivity categories 4 and 5, and category 1 buffer (RG Golden, Sustain Phase).	Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014			Compliant
	i) avoid development within sensitivity category 1 unless authorised in writing by the Department;			Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation.	
	ii) avoid development within sensitivity category 2-4, unless their location within these sensitivity categories is justified given other constraints and the impact on any MNES will be minimal, short term and recoverable;			Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation.	
	iii) where development cannot avoid areas of MNES within sensitivity category 2-4, preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species, and site infrastructure in or approximate to cleared areas, or areas of lower ecological condition such as previously disturbed or degraded areas; and			Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation.	
	iv) where ii-iii above cannot practicably be achieved, the proponent will site infrastructure that takes into account the written ecological advice of an approved ecologist.			Evidence to verify this element has been implemented.	Complete review of relevant documents and written advice from ecologists and undertake site inspection to confirm implementation.	
	Note: Justification is reportable in accordance with condition 13 a) vii). The management plan requirements under condition 8 h) may also indicate that a species or its habitat can co-exist with specific types of gas field infrastructure and operations.	Justification for TEC clearance sighted by the auditors in squad checks (gated internal constraints approvals) for the following linear infrastructure: -CMN153-1 -CMN170-2 -CMN236-2 -CMN280-1 CMN263-3 -CMN281-3	EPBC squad check justification spreadsheet for TEC disturbance in Combabula pressure zone 2A, Golden RG, Griffin BC, Pressure Zones 0A-4 and 1A-2	Evidence to verify this element has been implemented.	Review records reported in accordance with 13) a).	Compliant
	m. require the proponent to plan for and decide the extent that proposed linear infrastructure may have adverse impacts on MNES in accordance with the following:	Auditors advised that the approved alignment widths are incorporated into design, with the Origin environmental advisor undertaking a final check of alignment widths prior to issue to Principal Contractor. Leighton (Combabula gathering network PC) advised during the site visit that alignment widths are reduced below the approved width where possible, provided that safety on the right of way is not compromised.				Compliant
	i. all linear disturbance within environmental sensitivity category 1-4 for MNES and the impact risk zone must be:					

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
	I. limited to 12 metres in width for a single flow line;	Alignment sheets were requested during the audit, however were not able to be provided.		Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	
	II. limited to 18 metres in width for trenches with one water gathering line and one parallel gas gathering line;			Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	
	III. limited to 25 metres in width for multiple trenches where there are three parallel gas or water gathering lines or a single large diameter water pipeline (500mm or above);			Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	
	IV. limited to 30 metres for high pressure gas pipeline less than 750mm diameter;			Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	
	V. limited to 40 metres for high pressure gas pipeline equal to or greater than 750mm diameter;			Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	
	VI. limited to an additional 7 metres for each additional trench for water or gas lines.			Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	
	VII. limited to an additional 10 metres for each additional high pressure gas pipeline or large diameter water pipeline (500mm or above);			Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	
	VIII. limited to disturbance within identified infrastructure corridors;			Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	
	IX. where feasible, trenches, pipelines for associated water and other transmissions lines must be co-located to reduce total disturbance on MNES			Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	
	X. co-location will not be implemented where an assessment has determined that it is likely to increase impacts on MNES; and			Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	
	Note 1: These widths include provision for a utility corridor and access track.			Evidence to verify that these widths include provision for a utility corridor and access track.	Review documentation and conduct a site inspection to determine that widths include provision for a utility corridor and access track.	
	ii. In limited circumstances only (e.g. river crossings, where there are abnormal access constraints into a gas processing facility and when within close proximity to other proponent's linear infrastructure), increased corridor widths within areas of MNES may be required. In those circumstances a risk based site assessment will be completed to determine disturbance to MNES, identify management measures to minimise impacts to MNES and to justify the additional disturbance to MNES. The assessment will be available to the Department prior to any disturbance.			Evidence to verify this element has been implemented.	Review any associated risk based site assessments and verify any assessments have been made available to the Dept prior to disturbance.	
	Note: any disturbance referred to in this condition would be subtracted from the disturbance limits specified elsewhere in these conditions.			Evidence to verify that disturbances referred to in this condition have been subtracted from the disturbance limits specified elsewhere in these conditions	Review documentation and conduct a site inspection to determine that disturbances referred to in this condition have been subtracted from the disturbance limits specified elsewhere in these conditions	

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
	n. support bioregional corridors for listed threatened species and migratory species, and connectivity for listed threatened ecological communities;	Bioregional corridors (regional and state) are mapped and groundtruthed. Bioregional corridor mapping is included with the standard environmental map suite of workpacks	Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014 Combabula Gathering System – Golden RG – Field Services Group (FSG), Drilling and Completions Environmental Workpack, Q-4200-15-WP-1044 Revision: 0, 16 April 2014 Combabula Gathering System – Golden & Wathen Zones 2A – Field Services Group (FSG) and Drilling Environmental Workpack, Q-4200-15-WP-1019 Revision: 0, 12 December 2012 Combabula Gathering System, Griffin BC, Pressure Zones 0A-4 & 1A-2 Environmental Workpack, Q-4200-15-WP-1027 Revision: 0, 31 May 2013 Reedy Creek Water Treatment Facility (WTF) - Lots 72WV619, 29WV630, 30WV630 and 34WV774 Environmental Workpack, Q-4240-15-WP-0001 Revision: 2, 21 November 2012 Reedy Creek Gas Processing Facility (GPF) Construction Environmental Workpack, Q-4231-15-WP-0001 Revision: 1, 16 November 2012 Combabula – Gas Processing Facility Earthworks, Road Works and Drainage Environmental Workpack, Q-4200-15-WP-1005 Revision: 2, 28 January 2014	Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	Compliant
	o. ensure site assessments and field ecological surveys:					
	i. are undertaken in accordance with the Department's survey guidelines in effect at the time of the survey. This information can be obtained from http://www.environment.gov.au/epbc/guidelines-policies.html#threatened;	The ecology assessment reports state that scouting surveys were conducted in general accordance with the BioCondition – A Condition Assessment Framework for Terrestrial Biodiversity in Queensland – Assessment Manual – Version 2.1 (BioCondition Manual) (Eyre et al., 2011) and the Methodology for Survey and Mapping of Regional Ecosystems and Vegetation Communities in Queensland (Neldner et al., 2005). The DSEWPaC Survey Guidelines for Australia's Threatened Reptiles state that "Typically, in the temperate parts of Australia, most reptile species are best surveyed in late spring and early summer, and should not be surveyed between May and September", dependent on weather. The pre-clearance surveys provided were conducted between the months of October and April.	Ecology Assessment Report 21AB47, 22AB47, 24AB142, Q-4200-15-RP-1024 Revision: 0, 30May 2013 Lot 25AB50 Ecology Assessment Report, Q-4200-15-RP-1013 Revision: 0, 16 May 2012 Ecology Assessment Report Lot 23 AB47, Q-4200-15-PR-1010, Revision 0, 2 February 2012 Lot 3 on AB195 Ecology Assessment Report, Q-4500-15-RP-1005 Revision: 0, 30 January 2013 Ecology Assessment Report Lot 2 AB196, Q-4500-15-RP-1025 Revision: 0, 19 September 2012 Ecology Assessment Report Lot 1 AB78, Q-4500-15-RP-1027 Revision: 0, 22 January 2013 DSEWPaC Survey Guidelines for Australia's Threatened Reptiles, http://www.environment.gov.au/system/files/resources/eba674a5-b220-4ef1-9f3a-b9ff3f08a959/files/survey-guidelines-reptiles.pdf	Evidence to verify this element has been implemented.	Review documentation to verify site assessments and ecological surveys are undertaken in accordance with Dept guidelines	Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
	ii. take into account and reference previous ecological surveys undertaken in the area and relevant new information on likely presence or absence of MNES;	The Potters Flat pre-clearance survey report refers to previous ecology reports. The remainder of pre-clearance surveys (1A-3, Crosby, Keys) viewed during the audit do not provide a reference to previous reports. The ecology assessment reports state that the assessment includes a "review of any existing documentation published within the locale."	Ecology Assessment Report 21AB47, 22AB47, 24AB142, Q-4200-15-RP-1024 Revision: 0, 30May 2013 Lot 25AB50 Ecology Assessment Report, Q-4200-15-RP-1013 Revision: 0, 16 May 2012 Ecology Assessment Report Lot 23 AB47, Q-4200-15-PR-1010, Revision 0, 2 February 2012 Lot 3 on AB195 Ecology Assessment Report, Q-4500-15-RP-1005 Revision: 0, 30 January 2013 Ecology Assessment Report Lot 2 AB196, Q-4500-15-RP-1025 Revision: 0, 19 September 2012 Ecology Assessment Report Lot 1 AB78, Q-4500-15-RP-1027 Revision: 0, 22 January 2013 Pre-clearance survey report: R. Golden 'Potters Flat', Lot 21 on Plan AB47, Lot 22 on Plan AB47 and Lot 24 on Plan AB142, Combabula Tenement. Boobook, Revision 0, 23 January 2014 Australia Pacific LNG preclearance ecological assessment: Griffin BC pressure zone 1A-3, Ausecology, Revision 0, November 2013 Preclearance Survey of: Lot 7 on plan RG18, Lot 19 on plan RG189, Lot 20 on plan RG18, and Lot 38 on plan RG68, AMEC, Revision 0, February 2013 Pre-clearing Survey in Relation to Lot 18 SP133341 (Crosby Property), New Ground, 12 February 2013	Evidence to verify this element has been implemented.	Review of documentation to determine implementation of this condition.	Not compliant
	iii. are undertaken by a suitably qualified ecologist approved by the Department for sensitivity categories 1-4;	Refer to condition 5.c) It is not clear which sensitivity category the pre-clearance surveys have been conducted in. Therefore, it was not able to be determined if an approved ecologist was required to undertake the survey.		Evidence to verify this element has been implemented.	Review documentation to verify these site assessments and ecological surveys were undertaken by suitably qualified and approved ecologists.	Undetermined
	iv. are undertaken by a suitably qualified environment officer for sensitivity categories 5-7;			Evidence to verify this element has been implemented.	Review documentation to verify these were undertaken by suitably qualified environment officers.	
	v. document the survey methodology, results and significant findings in relation to MNES.	The pre-clearance surveys and ecology assessment reports each include sections documenting survey methodology, results and significant findings.	Ecology Assessment Report 21AB47, 22AB47, 24AB142, Q-4200-15-RP-1024 Revision: 0, 30May 2013 Lot 25AB50 Ecology Assessment Report, Q-4200-15-RP-1013 Revision: 0, 16 May 2012 Ecology Assessment Report Lot 23 AB47, Q-4200-15-PR-1010, Revision 0, 2 February 2012 Lot 3 on AB195 Ecology Assessment Report, Q-4500-15-RP-1005 Revision: 0, 30 January 2013 Ecology Assessment Report Lot 2 AB196, Q-4500-15-RP-1025 Revision: 0, 19 September 2012 Ecology Assessment Report Lot 1 AB78, Q-4500-15-RP-1027 Revision: 0, 22 January 2013 Australia Pacific LNG preclearance ecological assessment: Griffin BC pressure zone 1A-3, Ausecology, Revision 0, November 2013 Pre-clearance survey report: R. Golden 'Potters Flat', Lot 21 on Plan AB47, Lot 22 on Plan AB47 and Lot 24 on Plan AB142, Combabula Tenement. Boobook, Revision 0, 23 January 2014 Preclearance Survey of: Lot 7 on plan RG18, Lot 19 on plan RG189, Lot 20 on plan RG18, and Lot 38 on plan RG68, AMEC, Revision 0, February 2013 Pre-clearing Survey in Relation to Lot 18 SP133341 (Crosby Property), New Ground, 12 February 2013	Evidence to verify this element has been implemented.	Review documentation to verify the implementation of this condition.	Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
	vi. apply best practice site assessment and ecological survey methods appropriate for each listed threatened species, migratory species, their habitat and listed ecological communities as detailed in the Protocol;	The ecology assessment reports state that scouting surveys were conducted in general accordance with the BioCondition – A Condition Assessment Framework for Terrestrial Biodiversity in Queensland – Assessment Manual – Version 2.1 (BioCondition Manual) (Eyre et al., 2011) and the Methodology for Survey and Mapping of Regional Ecosystems and Vegetation Communities in Queensland (Neldner et al., 2005). The DSEWPaC Survey Guidelines for Australia's Threatened Reptiles state that "Typically, in the temperate parts of Australia, most reptile species are best surveyed in late spring and early summer, and should not be surveyed between May and September", dependent on weather. The pre-clearance surveys provided were conducted between the months of October and April.	Ecology Assessment Report 21AB47, 22AB47, 24AB142, Q-4200-15-RP-1024 Revision: 0, 30May 2013 Lot 25AB50 Ecology Assessment Report, Q-4200-15-RP-1013 Revision: 0, 16 May 2012 Ecology Assessment Report Lot 23 AB47, Q-4200-15-PR-1010, Revision 0, 2 February 2012 Lot 3 on AB195 Ecology Assessment Report, Q-4500-15-RP-1005 Revision: 0, 30 January 2013 Ecology Assessment Report Lot 2 AB196, Q-4500-15-RP-1025 Revision: 0, 19 September 2012 Ecology Assessment Report Lot 1 AB78, Q-4500-15-RP-1027 Revision: 0, 22 January 2013 DSEWPaC Survey Guidelines for Australia's Threatened Reptiles, http://www.environment.gov.au/system/files/resources/eba674a5-b220-4ef1-9f3a-b9ff3f08a959/files/survey-guidelines-reptiles.pdf	Evidence to verify this element has been implemented.	Review documentation to verify the implementation of this condition.	Compliant
	Note: Best practice includes applying the optimum timing and frequency of site assessments and surveys to determine presence of listed threatened species or migratory species or their habitat, or a listed threatened ecological community.	The DSEWPaC Survey Guidelines for Australia's Threatened Reptiles state that "Typically, in the temperate parts of Australia, most reptile species are best surveyed in late spring and early summer, and should not be surveyed between May and September", dependent on weather. The pre-clearance surveys provided were conducted between the months of October and April.	Ecology Assessment Report Lot 23 AB47, Q-4200-15-PR-1010, Revision 0, 2 February 2012 DSEWPaC Survey Guidelines for Australia's Threatened Reptiles, http://www.environment.gov.au/system/files/resources/eba674a5-b220-4ef1-9f3a-b9ff3f08a959/files/survey-guidelines-reptiles.pdf	Evidence to verify the information contained within this note has been implemented.	Review documentation to verify the implementation of best practice methodology, including optimum timing and frequency of site assessments and surveys to determine presence of listed threatened species or migratory species or their habitat, or a listed threatened ecological community.	Compliant
	vii. apply the mapping of environmental constraints class sensitivity category 1-4; the infrastructure location requirements; minimum no impact zones; impact risk zones; and the width requirements for linear infrastructure corridors described in (m);	The ecology assessment reports and pre-clearance reports provide ground truthed environmental information, which is required to update the data identified in desktop assessment. The application of constraints and sensitivity reports is conducted separately.	Combabula Gathering System – Golden RG (Sustain Phase) Environmental Workpack, Q-4200-15-WP-1053 Revision: 1, 5 September 2014 Combabula Gathering System, Golden and Wathen, Pressure Zone 2A (Sustain phase) Environmental Workpack, Q-4200-15-WP-1052 Revision: 0, 12 September 2014 Combabula Gathering System – Golden RG – Field Services Group (FSG), Drilling and Completions Environmental Workpack, Q-4200-15-WP-1044 Revision: 0, 16 April 2014 Combabula Gathering System – Golden & Wathen Zones 2A – Field Services Group (FSG) and Drilling Environmental Workpack, Q-4200-15-WP-1019 Revision: 0, 12 December 2012 Combabula Gathering System, Griffin BC, Pressure Zones 0A-4 & 1A-2 Environmental Workpack, Q-4200-15-WP-1027 Revision: 0, 31 May 2013 Reedy Creek Water Treatment Facility (WTF) - Lots 72WV619, 29WV630, 30WV630 and 34WV774 Environmental Workpack, Q-4240-15-WP-0001 Revision: 2, 21 November 2012 Reedy Creek Gas Processing Facility (GPF) Construction Environmental Workpack, Q-4231-15-WP-0001 Revision: 1, 16 November 2012 Combabula – Gas Processing Facility Earthworks, Road Works and Drainage Environmental Workpack, Q-4200-15-WP-1005 Revision: 2, 28 January 2014	Evidence to verify this element has been implemented.	Review of approval documentation and site inspection to determine implementation of this condition.	Compliant
	viii. reports are published by the proponent on the internet 20 business days before clearance of native vegetation in an infrastructure impact area and provided to the Department on request;	Pre-clearance surveys are published at http://www.aplng.com.au/environment/pre-clearance-surveys Evidence was not able to be provided documenting upload of the surveys within the required timeframe.		Evidence to verify this element has been implemented.	Review APLNG website and verify timing before clearing native vegetation.	Undetermined

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
	p. require species and ecological community management plans which include:	The following plans have been developed by Australia Pacific LNG and approved by the Department of Sustainability, Environment, Water, Population and Communities (SEWPaC) (now Department of the Environment): -Threatened Fauna Management Plan -Threatened Flora Management Plan -Threatened Ecological Community Management Plan	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012 Letter from James Barker (SEWPaC) to Katherine Jack (Australia Pacific LNG) dated 1 September 2011. Australia Pacific LNG reference Q-LNG01-15-EA-0061			Compliant
	i. relevant avoidance and mitigation measures to be applied;	This is addressed in Sections 3 of the TECMP and TFLMP. This is addressed in Sections 2.15, 3.12, 4.5, 5.7, 6.5, 7.6, 8.5, and 9 of the TFMP. Site implementation is addressed on the Condition 8 implementation compliance evaluation table.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Evidence to verify this element has been implemented.	Review of Plans and site inspection to determine implementation of this condition.	Compliant
	ii. measures for protecting each listed threatened species and migratory species and their habitat, and each listed threatened ecological community not previously assessed by the proponent, should one or more be found in the project area at any time over the life of the project. Any such management plans must be developed in a timeframe to be approved by the Department. Notification of additional MNES found must be provided to the Department in writing within 10 business days. Measures must include the development of a management plan consistent with requirements under condition 8; and	This is addressed in Sections 1.1 of the TECMP, TFLMP and TFMP. "Separate management plans will be submitted to SEWPaC should a listed TEC which is not included in this TECMP be identified during the lifecycle of the gas field component of the project Notification of additional MNES found will be provided to DSEWPaC within 10 business days in accordance with Condition 5(p)." Site implementation is addressed on the Condition 8 implementation compliance evaluation table.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Evidence to verify this element has been implemented.	Review of Plans and site inspection to determine implementation of this condition.	Compliant
	q. ensure constraints planning and field development decisions are made in accordance with the Protocol (including any relevant species and ecological community management plans) before final selection of specific sites for gas field development within the project area.	Squad checks sighted for the following infrastructure: -CMN153-1 -CMN170-2 -CMN236-2 -CMN280-1 -CMN263-3 -CMN281-3 -CMN153 -CMN194 -CMN255 -CMN280	EPBC squad check justification spreadsheet for TEC disturbance in Combabula pressure zone 2A, Golden RG, Griffin BC, Pressure Zones 0A-4 and 1A-2	Evidence to verify this element has been implemented.	Review of Plans and site inspection to determine implementation of this condition.	Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
EPBC Approval Condition 8	The management plans required under condition 7 must be developed by a qualified ecologist approved in writing by the Department and as a minimum address the following as is relevant to each MNES:					
	a. current legal status (under EPBC Act);			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	Not applicable
	b. known distribution;			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	Not applicable
	c. known species' populations and their relationships within the region;			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	Not applicable
	d. extent of ecological community fragmentation within the region and if appropriate minimum patch size for that community;			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	Not applicable
	e. to support field identification and ecological surveys, description of the relevant characteristics of the ecological community;			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	Not applicable
	f. species' biology, reproduction and description of general habitat;			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	Not applicable
	g. to support field identification and ecological surveys, description of the species' habitat, which may be described in terms of essential habitat and microhabitat, associations with geology, soils, landscape features, associations with other native fauna and/or flora or ecological communities, and specific niche habitat descriptions;			Not applicable.	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	Not applicable

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
	Note: Constraints mapping may be limited by available data for many species and may therefore be inadequate to map habitat requirements for planning and management purposes, or to indicate presence without on ground assessment. Condition 8 g) requires the essential components of a species' habitat to be described where relevant to support field identification and environmental constraints decision making. This should include essential habitat components for widely distributed species present in low numbers and for other species likely to be present but not often observed.			This is for information only.	Not audited as it relates to inclusion of information to be covered in the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	Not applicable
	h. threats to MNES relating to the development and management of land within the gas fields including from the development, operation and decommissioning of infrastructure within the gas fields; and from groundwater extraction and aquifer depressurisation, CSG water use and disposal, whether the threat is within or outside the gas field development area;			Not applicable	Not audited as it relates to inclusion of information in the text of the plan. It is not an action that can be audited for implementation. This is covered under the general audit checklist for use in documentation review.	Not applicable
	Note: This part of a management plan may also indicate that a species or its habitat can co-exist with specific types of gas field operations.			This is for information only.	This is for information only	Not applicable
	i. relevant management practices and methods to minimise impact and recover from impact that should include:	Management practices in the species management plans include high visibility fencing and signage around TECs, briefing of MNES significance in toolbox talks and inductions, sign off of specific practices on the workpack hold point list, checklists and no barbed wire on the top rung of fencing. During the site visit the auditors observed the above requirements implemented along the gathering, drilling and gas field facility sites. Fauna records were reviewed for interaction with MNES species.	D&C Field Checklist Construction Environmental Compliance, Com280, Q-LNG-01-15-AQ-0523, 20 May 2014 Drilling fauna register, current to June 2014 Lease construction and drilling activities Environmental Induction Golden Wathem 2A Drilling Hold Point list - signed Golden RG Drilling Hold Point list - signed ESC Maintenance Register Nullin 2A, current to January 2015 ESA toolbox talk 24 May 2014 <u>Gathering</u> Weekly Environmental Inspection Checklist 28 August 2014, 30 August 2014, 20 September 2014, 17 October 2014, 25 January 2015 Kick-off Toolbox Talk Record RG Golden Construction 29 November 2014. Fauna Register, current to 26 January 2015 Golden RG, Commissioning System CM033, Hold Points list - signed Golden RG, Commissioning System CM034, Hold Points list - signed <u>Gas Processing Facility</u> Toolbox talks on fauna and TECs near project site, induction 28 March 2014 and 7 May 2014 Toolbox talk 8 May 2014 Weekly checklist 21 November 2013 Laing O'Rourke Environmental Site Induction QFC Fauna Management and Spotter/Catcher Services Report August 2014 and October 2014	Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation. Note this is not mandatory	Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
	i. site rehabilitation timeframes, standards and methods;	Rehabilitation was observed within the gathering, drilling and facilities areas at Combabula. It was noted that timeframes for rehabilitation are often dependent of other factors (e.g. well leases cannot be rehabilitated until gathering infrastructure is installed).		Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation. Note this is not mandatory	Compliant
	ii. use of sequential clearing to direct fauna away from an impact zone;	Discussions were held with on site personnel during the site visit. A clearing front for the gathering network (CMN114) was observed and the audit team discussed the process with the Queensland Fauna Consultancy fauna spotter on site. Auditors were advised that 2-3 days prior to clearing, fauna spotters engage in habitat load reduction and tagging of habitat trees. During clearing of the right of way, habitat trees are left overnight. Trees cleared the previous day are checked for fauna prior to mulching. Due to the linear nature of the gathering network, clearing is sequential. A similar process was described for the drilling and completions team (well leases cleared from one direction), and gas processing		Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation. Note this is not mandatory	Compliant

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
	iii. re-establishment of native vegetation in linear infrastructure corridors;	Several linear infrastructure corridors associated with the gathering network were observed to have been revegetated. Topsoil management provides a seed bank, and where this is insufficient a seed mix is sourced. The content of the seed mix is dependent on the landowners requirements. It was noted that where native vegetation is re-established, the seed mix is sourced locally.	Discussions with on site personnel, inclduing principal contractors.	Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation. Note this is not mandatory	Compliant
	iv. welfare and safe handling of fauna specimens requiring relocation from impact sites;	No relocation of fauna was observed during the site visit. Fauna registers and spotter reports reviewed for drilling, gathering and facilities teams. Relocations are regularly recorded.	QFC Fauna Management and Spotter/Catcher Services Report August 2014 and October 2014 Drilling fauna register, current to June 2014 Gathering Fauna Register, current to 26 January 2015	Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation. Note this is not mandatory	Compliant
	v. handling practices for flora specimens;	No handling of flora specimens was observed on site.		Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation. Note this is not mandatory	Not applicable
	vi. translocation practices and monitoring for translocation success;	No evidence of translocation and monitoring provided.		Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation. Note this is not mandatory	Undetermined
	vii. monitoring methods including for rehabilitation success and recovery;	No records of rehabilitation monitoring provided. Auditors advised that a document relating to translocation is currently being developed.		Evidence to verify this element has been implemented.	Complete review of relevant documents and undertake site inspection to confirm implementation. Note this is not mandatory	Undetermined

Criterion	Criterion Description	Independent auditor comments	Measurements made (evidence)	Requirement	Verification Method	Compliance Finding
	j. surface and ground water quality and quantity requirements, including relevant downstream environmental quality parameters;	A culvert is under construction adjacent to a TEC at the gas processing facility site. Auditors advised that, a check was made of the culvert prior to recent rain, and downstream erosion and sediment control was implemented. This was observed by site personnel to prevent sediment flowing into the TEC. No evidence of watercourse interaction with gathering or drilling was observed during the site visit. Extensive evidence of erosion and sediment control maintenance conducted after a recent rain event was observed during the site audit.	Site audit	Evidence to verify this element has been implemented.	Field inspection of water courses with MNES to examine condition of water courses, e.g. no evidence of pollution or degradation.	Compliant
	k. reference relevant conservation advice, recovery plans, or other policies, practices, standards or guidelines relevant to MNES published or approved from time to time by the Department.	References for each species is provided in the TFMP, TFLMP and TECMP.	Threatened Fauna Management Plan Q-LNG01-15-MP-0113 Revision 2 7 May 2013 (Revision 0 29 March 2012) Threatened Flora Management Plan Q-LNG01-15-MP-0108 Revision 0 29 March 2012 Threatened Ecological Community Management Plan Gas Fields Q-LNG01-15-MP-0114 Revision 0 29 March 2012	Check number of adverse impacts on MNES thus far on the project that has been registered.	Evaluation of evidence	Compliant
	Note: The management plans must include sufficient detail to inform field development decisions, ongoing management and decommissioning, and management external to the project area to minimise impacts on MNES through the life of the project.	The management plans, and their incorporation into environmental work packs, were known by field personnel (including principal contractors). This indicates that the plans are used to inform field decisions.	Site audit	Evidence to verify this element has been implemented.	Review of Plans and site inspection to determine implementation of this condition.	Compliant
	Note 1: To the extent that the requirements of condition 8 are satisfied for each species, a single plan may be prepared to address a group of species which have similar ecological characteristics and habitat needs. Other conditions also require species or ecological community management plans to be developed in certain circumstances in accordance with condition 8.			This is for information only.	This is for information only	Not applicable

APPENDIX B AUDITOR'S CURRICULUM VITAE

Curriculum Vitae

Qualifications

Bachelor of Environmental Science (Land Resources) Honours: First Class University of Wollongong NSW, Australia 1995.

Rob Storrs

Principal Environmental Scientist

Areas of Experience

- Environmental Impact Assessment
- Project Management
- Environmental Auditing
- Approvals

Career Summary

Rob Storrs is a Principal Environmental Scientist with over 19 years' experience in managing and investigating environmental issues and project managing environmental approvals processes. He has worked with the mining, petrochemical and chemical industry across Asia Pacific and the UK for the past ten years. Rob has extensive experience managing projects through the EIA process, having lead over 5 EIAs in the last 5 years, including the award-winning Alpha Coal Mine EIA. Rob is a qualified RABQSA Environmental Auditor (environmental management systems, report verification and contaminated land) and has highly developed project management and auditing skills.

Career Details

URS Australia

Auditing

Project Director, LNG Project Compliance Audit (Pipeline, Gas Field and Plant), Australia Pacific LNG, 2012

Rob as a certified environmental auditor was the Project Director for the Australia Pacific LNG environmental authority compliance audits. These audits covered the entire project (pipeline, gas field and plant) and addressed the state and federal approval conditions. The audit reports received favourable feedback from both the regulator and APLNG and assisted APLNG to update their compliance program for future audits.

Project Director, APLNG Compliance Audits – Various, Australia Pacific LNG, 2012 - 2013

Rob was the Project Director on four additional CSG related audits for Australia Pacific LNG relating to pipeline approvals and water treatment facilities. In this role Rob was responsible for the technical direction of the audits and peer review of the deliverables.

Due Diligence Auditor – Various confidential clients – 2005 - 2012

Rob has undertaken due diligence audits for the purpose of property acquisition in both the UK and Australia. These due diligence assessments have been in the chemical, packaging, environmental laboratory, engineering and petroleum industries.

Project Manager, Contaminated Site Phase I Auditing, Southern Queensland, Department of Defence, 2009-2010

Rob was the Project Manager and auditor for a phase I environmental assessment of the Oakey air base in southern Queensland. The site dates from pre-WWII and the project included desktop assessments, site inspections and report writing. The project involved getting the required security clearances and working closely with defence personnel to build an accurate picture of the sites' varied history and identify key risks for further investigation.

Auditor, Xstrata Copper Sustainability Auditing, 2009

As part of their corporate sustainable development procedures, Xstrata developed a Sustainable Development Charter, which is routinely audited at selected sites. Xstrata Copper Mount Isa is a large mine and smelting operation in central Queensland and Rob was one of five auditors who were based on-site for a week undertaking the assessment. The audit required the rapid assimilation of new and varied information and delivery of findings at the end of the audit period.

Phase I Auditor, Various Petroleum Sites, Australia and the Pacific Islands, 2002 - 2009

In his time at URS, Rob has undertaken a large number of phase I investigations at petroleum sites, including sites throughout Queensland, New Caledonia and Western Samoa. He has managed the vast majority of these projects.

Other Projects:

- QNI Ore Supplier Environmental Review, New Caledonia, Nickel Mines.
- Pisces Coal Project EIS review (Central Queensland).
- Corporate sustainability report verification of mining, smelting and construction sites in Australia and South Africa.
- Project Manager of numerous Shell Engineering and Exxon Mobil phase 1 and phase 2 contaminated site investigations and validation assessments within Australia and the Pacific Islands (Samoa, New Caledonia and PNG).
- Engaged in the development of an ISO14001 certified EMS for multiple sites for an international mining company and a national meat producer.
- Project Manager and field auditor for an Australia wide abattoir environmental benchmarking project. This included ten sites covering five states.
- Capping and contamination assessment of the historical Toowoomba landfill, Queensland, Australia.

Environmental Impact Assessment / Approvals

Project Manager, Santos GLNG Gas Field Development Project EIS, 2013–ongoing

Rob is the Project Manager for the preparation of an EIS for the expansion of the GLNG gas field to increase the number of coal seam gas wells, gathering lines and treatment facilities. In this role Rob is responsible for the EIS delivery and meeting the client and regulator expectations.

Project Manager, Alpha Coal Mine Project EIS, Galilee Basin Queensland, Hancock/GVK, 2010 - 2012

Rob was the Project Manager for this state-significant project coal mine EIS, the first in the Galilee Basin to receive state and federal approval. The project is a 30 Mtpa greenfield open-cut coal mine and 500 km rail line and Rob was responsible for all aspects of the mine EIS and the overall delivery and combination of the mine and rail components. During the project, Rob was heavily involved in government (local, state and federal) and community liaison and negotiating approval conditions. In

recognition of his work on this project Rob was awarded the Project Management and Business Development Pyramid Awards from URS for the Asia Pacific region in 2011.

Project Manager, Kevin's Corner Coal Mine Project EIS, Galilee Basin Queensland, Hancock/GVK, 2011 - 2013

Rob was the Project Manager for this state-significant project coal mine EIS. The Project a 30 Mtpa greenfield underground and open-cut coal mine has received state approval and is currently waiting to receive federal approval. Rob was responsible for all aspects of the EIS and SEIS including deliverable, schedule and budget. During the project, Rob was heavily involved in government (local, state and federal) and community liaison. Rob played an important role in developing the environmental authority conditions for the project allowing them to be tabled in the Coordinator Generals report as stated conditions so reducing the risk to Hancock/GVK of court appeals.

Project Manager, MIM Environmental Authority Transition Process, Xstrata Copper, 2009 - 2010

Rob was the Project Manager on this challenging environmental approvals project. The 85 year old Mount Isa Mine was required to develop a new Environmental Management Plan and Environmental Authority conditions, due to legislation changes brought under the Queensland EP Act in 2009. Rob managed over eight specialist sub-consultants who worked on areas from human health risk assessments, and hydrological modelling, to particulate and noise modelling. Additionally a program of expert peer review was developed and engaged to confirm the findings and add rigour to the process. The end result was a new EA for the site and transitional conditions allowing MIM to achieve both business and environmental goals.

Project Manager, Caval Ridge Coal Mine Project EIS, Central Queensland, BMA, 2009 - 2010

Rob was the Project Manager for the state-significant Caval Ridge EIS, an 8 Mtpa greenfield open-cut coal mine situated near Moranbah in central Queensland. Rob was responsible for all aspects of the EIS including deliverables, schedule, budgets and sub-consultants. In addition to the EIS, Rob was involved in the change applications submitted to the Coordinator-General for the project's accommodation village. The project was the centre of community concerns about dust impacts and the introduction of 100% FIFO. URS played a key role in assisting to negotiate an acceptable outcome for BMA on these issues. This project has been approved and is currently being constructed.

Project Manager / Project Director, Ellensfield Coal Mine Project EIS, Central Queensland, Vale, 2007 - 2013

Rob was the initial Project Manager (2007 – 2010) for the Ellensfield EIS, a 5 Mtpa greenfield underground coal mine situated near Moranbah in central Queensland before assuming the role of Project Director on this project in 2011. This project included aspects of coal seam gas, power generation and desalination. Rob was responsible for all aspects of the EIS including deliverables, schedule, budgets and sub-consultants. Over the course of the EIS, Rob participated in protracted regulator negotiations and project changes. This project was a voluntary EIS under the EP Act and is in the final stages of approval.

Baseline Study Manager, Large Oil Shale Deposit EIS, Queensland, Confidential Client, 2007 - 2008

Rob was the Assistant Project Manager and responsible for thirteen study components of a confidential major EIS baseline project in Queensland including a mine, power station, pipelines and port. The study areas and sub-consultants that Rob was responsible for included air and noise, surface water, marine water quality, coastal processes and acid sulphate soils. The project was

unique for Queensland and required the management of a wide variety of studies in difficult to access areas.

Project Director, Environmental Approvals - Micro LNG Facility, Condamine Region, BOC, 2010 - ongoing

Rob was the Project Director for the environmental approvals process for a micro LNG facility to be located in the Condamine Region. The project included the development of an EM Plan, EA conditions and financial assurance information to support a Petroleum Licence application.

Other Projects:

- Assisted in review and summary of Environmental Management Plans and legal requirements for a Greenfield gold mine in NSW, Australia (2004).
- Development of Environmental Management Plans (EMPs) for EMS implementation at central Queensland Coal Mine sites.
- Soil and rehabilitation component of the Alcan Gove (Northern Territory Aluminum Refinery) expansion EIS.

Other

Client Account Manager for Hancock/GVK 2010–ongoing

Rob is currently the URS client account manager for Hancock GVK. He has held that position since developing the relationship as part of the Alpha Coal EIS. Rob is the primary contact for all URS work with Hancock GVK. Through growing this mutually beneficial relationship URS has undertaken approvals, engineering, planning, monitoring and compliance work packages.

Project Manager, Chlorinated Solvent Site Investigation, Brisbane, Confidential Client, 2006 - 2007

Rob was the Project Manager on confidential chlorinated solvent site investigation and remediation project in Brisbane. Rob planned, supervised and undertook drilling and groundwater investigations as well as soil vapour testing to determine potential levels of impact and risk at more than one industrial site. In this role Rob engaged and liaised with regulator third party reviewers.

Other Projects:

- Thalanga Copper Mine and highway reward mine environmental risk assessment. Central Queensland.
- Thalanga Copper Mine West rock waste dump drainage and erosion control design.
- James Hardie sand mining lease relinquishment criteria and licencing.

Professional History

- URS Australia Pty Ltd, 2001-present
- Stormwater Trust – NSW, Environmental Assessment Officer, 1999-2000
- BHP Coal, Environmental Officer, 1997-1999
- Dames & Moore, Environmental Planner/Waste Audit Leader, May-Oct 1996

Education and Training

- Certified RABQSA Environmental Auditor, 2003
- URS Certified Project Manager, 2008
- Certificate in Training Small Groups, “Assessment & Workplace Training”.
- Environmental Management Systems Auditor Training Course 2002

Curriculum Vitae

David Curwen

Principal Environmental Scientist

Areas of Experience

- Environmental regulatory compliance
- Due diligence
- Environmental risk assessment
- Environmental management systems
- Process and resource optimisation and auditing

Career Summary

Qualifications

MSc - Environment, Health and Safety, 2004

BSc (Hons) Environmental Studies, 1995

David is an environmental specialist with over 18 years' experience in environmental consultancy and operational plant support.

David has extensive experience in the oil & gas, power and waste sectors, providing support to government bodies and direct to industry including regulatory compliance, environmental risk assessment, process optioneering, management systems, process and resource optimisation and auditing.

Career Details

Principal Environmental Scientist, URS

David recently project managed the Australia Pacific LNG third party independent Coordinator-General (CG) audit and was one of the URS team of auditors approved by both Queensland CG and Department of Environment and Heritage Protection (EHP). The subsequent report received very positive feedback from the CG on its thoroughness, readability and presentation. David has also recently provided peer review services for an audit of the ConocoPhillips Curtis Island LNG operations assessing the implementation of their Construction EM Plan, audited the Australia Pacific LNG Combabula and Narrows Crossing EAs, the Australia Pacific LNG Talinga Recycled Water Management Plan and assessed environmental compliance manual implementation for the Shell (Pinkenba) installation. David has also been approved by the NSW government as an independent third party auditor and is currently undertaking a compliance audit for a construction sector client.

David is the call-off contract manager for GLNG OPL providing downstream services to GNLG and is the project manager for the Vale Ellensfield and New Lenton EIS projects and has supported the EISs for the Arrow Energy Bowen Gas Project and BMA Goonyella Riverside Coal Project and developed the EM Plan for the Hancock Kevin's Corner Coal Mine Project.

Principal Consultant/Senior Consultant, Entec

David was responsible for developing, managing and resourcing projects in the public sector as well as across the oil & gas, power, chemicals, nuclear, waste and combustion sectors. His role included technical project delivery and project management (including budget and resource control), technical review and

business development and client management. David also managed multidisciplinary teams of project staff across the UK.

David provided services to a number of clients including ExxonMobil, BP/Ineos, Electricitie de France (British Energy) and Scottish Power (Iberdrola), as well as regulatory and government bodies such as the Environment Agency, Scottish Government and a number of water and waste utility providers.

A key feature of David's role was the management and preparation of environmental regulatory submissions. This required a broad range of skills including environmental impact assessment (air and water quality), process optimisation, risk assessment (environmental accidents), abatement optioneering, resource efficiency (waste/waste/energy), environmental management system assessment, noise/odour impacts and best available technique (BAT) assessment.

Areas of experience include:

- Due Diligence auditing supporting mergers and acquisitions. Assessing risks, liabilities and legislative compliance individually and as a member of nationwide teams.
- Auditing of management systems and permit compliance. Development of waste and water efficiency audit methodologies and auditing of operational sites. Training and supervision of junior staff to perform audits through the development of audit templates and methodologies.
- Corporate environmental and sustainability reporting including gap analysis of operations against reporting indices such as the Global Reporting Initiative (GRI), data collection and verification across operating sites.
- Providing support to UK environment agencies in the technical assessment of environmental permit applications (chemicals, power generation, waste treatment and large volume food and drink
- Project management and technical assessment, reporting of findings to clients including government and regulatory bodies.
- Representation of clients to regulators and liaison with regulators.

Examples of project work include:

- Confidential due diligence audits of numerous companies across England, Northern Ireland and Scotland for potential purchasers assessing environmental compliance, performance and identifying potential liabilities.
- National audit of power generation facilities for Scottish Power (coal, gas and hydro) assessing management system compliance and resource efficiency (raw material use and waste management practices).
- Environmental permitting for ExxonMobil cited as best practice by the regulator.
- Environmental Permit technical assessment, determination and permit writing for the Environment Agency and Northern Ireland Environment Agency.
- Water balance, effluent abatement technology and impact assessment for BP refinery and chemical plants.
- Environmental impact assessment of process discharges from power plant for Scottish Power.
- Nation-wide waste assessment of chemical, biological, radioactive and nuclear (CBRN) waste treatment and disposal options for the Scottish Government.
- Permitting of new build and existing nuclear power plant (7 existing sites, two new build sites).
- Environmental risk assessment at the main Nestle chocolate crumb facility in the UK.
- Environmental optimisation of new build waste treatment and disposal facilities for the decommissioning of nuclear facilities.

David Curwen. *Principal Environmental Scientist*

Environment Engineer, Sellafield Site (nuclear fuel reprocessing

- Held the role of EMS Area Environmental Coordinator.
- Responsible for compiling the annual reporting returns to the Environment Agency.
- A member of the Sellafield Emergency Response Team.
- Environmental Risk Assessor to the Plant Modification Process.
- Plant optimisation studies including scrubber operations, cooling tower operations,
- Managing the regulatory interface which involved negotiating permit conditions on behalf of BNFL.
- Assessment of the business impacts of a pollution incident to a salmon river factoring in financial impact of negative PR, loss of amenity and tourism associated to understand the true business cost of environmental harm.

Professional History

Principal Environmental Scientist, URS, 2014 - present

Senior Associate Environmental Scientist, URS, 2011 - 2013

Principal Consultant, AMEC Entec UK, 2007 - 2011

Senior Consultant, Entec UK, 2001 - 2007

Environment Engineer, British Nuclear Fuels Limited Sellafield, 1996 - 2001

Education and Training

MSc Environment, Health and Safety, University of Sunderland, 2004

BSc (Hons) Environmental Studies, University of Sunderland, 1995

Registration

Member of the Environment Institute of Australia and New Zealand (MEIANZ)

Curriculum Vitae

Qualifications

Masters of Environmental Management - Sustainable Development, University of Queensland, 2012

Bachelor of Science - Marine Science with Distinction, University of Sydney, 2008

Kate Every

Environmental Scientist

Areas of Experience

- Environmental compliance auditing
- Environmental assessment and approvals
- Project management
- Aquatic ecology
- Marine acoustics
- Occupational hygiene and HAZMAT

Career Summary

Since joining URS in 2011, Kate has been involved in a diverse range of projects at URS including coal seam gas environmental compliance auditing, coal and bauxite environmental impact assessments, and assisting the client environmental approval process.

Kate has also worked on urban and marine acoustics projects, including the Hay Point Coal Terminal Expansion and Clem7 tunnel noise compliance monitoring.

Career Details

Compliance Auditing

Environmental Auditor, Environmental Authority Audits, Australia Pacific LNG, Combabula Development Area and Narrows Pipeline, Queensland

In 2013, URS was commissioned to undertake independent third party audits of the Australia Pacific LNG Combabula Development Area and Narrows Pipeline (PPL162) environmental authorities. The audits were conducted in accordance with AS/NSZ ISO 19011:2003. This work involved on-site and office based auditing of activities and documentation associated with the environmental authorities. Kate was responsible for the audit of management plans and documents against the environmental authority conditions, undertaking the audit of activities, coordination of requests for information, the administration of audit templates and findings, and liaison with APLNG responsible parties. Through these audits, Kate has gained a strong understanding of environmental authority conditions and their application to resource projects.

Coordinator-General approved audit team, APLNG Environmental Conditions and Approvals Audit

APLNG engaged URS to undertake a third party audit of the company's compliance with the conditions of the Coordinator General's report on the Project's EIS, environmental authority(s) and developmental approvals. The audit reviewed compliance with the environmental and social conditions across the Project's Condabri Gas Field, main transmission pipeline and LNG facility. The audit was conducted in accordance with AS/NSZ ISO 19011:2003 and the CG Audit Guidelines. Kate was responsible for the audit of APLNG management plans and documents against CG, EA and EPBC conditions, coordination of

requests for information and evidence documents, the administration of audit templates and findings, and liaison with APLNG responsible parties.

Other Projects

- Environmental Auditor, Recycled Water Management Plan Audit, Australia Pacific LNG, Talinga Water Treatment Facility, Queensland
- Environmental Auditor, *Environment Protection and Biodiversity Conservation Act* approval audit, Australia Pacific LNG, Walloons Gas Fields, Queensland

Environmental Assessment/Approvals

Assistant Project Manager - Project Management Team, South of Embley Bauxite Mine and Port Project Commonwealth EIS, Rio Tinto, Weipa

The Rio Tinto Weipa South of Embley Bauxite Mine and Port Project required the management of a range of environmental and engineering specialists to assess impacts and develop mitigation measures to proactively address agency concerns, in order to facilitate timely approval and minimise overly onerous conditions. One of Kate's main roles as Assistant Project Manager was to find innovative ways to provide clear and traceable documentation to address the unique requirements of DSEWPaC's Tailored EIS Guidelines, including the development and refinement of several EIS chapters. This project also provided valuable insight into the current expectations of the Commonwealth related to survey guidelines, offsets and significance determinations as these expectations have been evolving over time. The project was approved with minimal conditions in regards to shipping, despite considerable publicity.

Assistant Project Manager, Red Hill Mining Lease Project EIS Addendum, BMA, Queensland

URS was engaged by BMA to prepare an EIS, and subsequently an EIS addendum, for a proposed mine expansion adjacent to the existing Goonyella Riverside Broadmeadow complex. Kate role as assistant project manager involved the compilation of the final stages of the EIS and the development of the addendum in response to stakeholder submissions. Kate has been responsible for budget management, addendum compilation and the ongoing liaison with BMA, relevant government bodies and technical specialists, including subcontractors.

Other Projects

- Assistant Project Manager, Jet A1 Fuel Pipeline Project, Caltex Refineries (QLD) Pty Ltd
- Project Management Team, New Lenton Coal Mine EIS, New Hope Coal, Queensland
- Project Administrator, Project Management Team, Kevin's Corner Coal Project, Hancock Coal Galilee Pty Ltd
- Approvals Coordinator, Alpha Coal Project, Secondment to Hancock Coal Pty Ltd, Queensland

Professional History

Environmental Scientist, URS Australia Pty Ltd, January 2013 - present

Graduate Environmental Scientist, URS Australia Pty Ltd, August 2011 – December 2012

Project Consultant Acoustics, Occupational Hygiene and HAZMAT, SLR Consulting (Australia) Pty Ltd (previously Heggies Pty Ltd), 2010 - 2011

Kate Every.*Environmental Scientist*

Education and Training

Masters of Environmental Management - Sustainable Development, University of Queensland, 2012

Bachelor of Science - Marine Science with Distinction, University of Sydney, 2008

URS Project Manager Certification, 2014

Standard 11 Mine Induction – Surface Operations, 2013

PMASUP236B - Operate Vehicles in the Field, 2014

RIIVEH305A - Operate and Maintain 4WD Vehicle, 2014

First Aid/CPR

Queensland Government Department of Science, Information, Technology, Innovation and the Arts National Pollutant Inventory training, 2014

Professional Membership

Environment Institute of Australia and New Zealand, Associate member

APPENDIX C AUDITOR'S STATUTORY DECLARATIONS

Australian Government

Department of the Environment

AUDITORS DECLARATION OF INDEPENDENCE

I, *[name of auditor]* ***Robert Storrs***

of *[name of organisation and full address]* ***URS Australia Pty Ltd***

Level 17, 240 Queen Street, Brisbane Queensland 4051

declare that to the best of my knowledge and belief I and my organisation do not have any conflicting or competing interests with:

The Auditee *[name of Auditee]* ***Australia Pacific LNG or Origin Energy***

_____ , the Auditee's staff or representatives or other persons associated with the Auditee, including any personal, financial, business or employment relationship, except to the extent detailed below.

The project to be audited *(name of EPBC Act/Sea Dumping Act project]*

Australia Pacific LNG Project – Walloons gas fields within the Surat Basin in south central Queensland (EPBC 2009/4974)

I shall notify the Department of the Environment within seven days of any change in these circumstances or any other change that may affect my independent status.

I shall at all times observe any professional code of conduct and/or ethics applicable to undertaking audits (i.e. -as prescribed by the agency with which I hold accreditation/membership). I take full responsibility for any factual inaccuracy or mistake made in giving this declaration, particularly to the extent that others rely upon the truth of this declaration. I acknowledge that the Department of the Environment may request further information to verify my independence at any time.

Details of any personal, financial, business or employment relationship with the Auditee, the Auditee's staff, representatives or associated persons. (This is in the context of both the person making the declaration and the organisation that they are employed by -leave blank if none):

Details of any personal, financial, business or employment relationship with the project to be audited (This is in the context of both the person making the declaration and the organisation that they are employed by- leave blank if none):

Details of professional accreditations/memberships:

Environment Institute of Australia and New Zealand (Member)
Queensland committee for economic development of Australia (CEDA) trustee
Consult Australia Queensland Environment Committee member

In making this declaration, I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both. An extract of section 491 of the EPBC Act is attached.

Signed

Full name (please print) Robert Charles Andrew Storrs

Organisation (please print) URS Australia Pty Ltd

Date *19/ 02/ 2015*

Australian Government

Department of the Environment

AUDITORS DECLARATION OF INDEPENDENCE

I, *[name of auditor]* ***David Curwen***

of *[name of organisation and full address]* ***URS Australia Pty Ltd***

Level 17, 240 Queen Street, Brisbane Queensland 4051

declare that to the best of my knowledge and belief I and my organisation do not have any conflicting or competing interests with:

The Auditee *[name of Auditee]* ***Australia Pacific LNG or Origin Energy***

_____ , the Auditee's staff or representatives or other persons associated with the Auditee, including any personal, financial, business or employment relationship, except to the extent detailed below.

The project to be audited *(name of EPBC Act/Sea Dumping Act project]*

Australia Pacific LNG Project – Walloons gas fields within the Surat Basin in south central Queensland (EPBC 2009/4974)

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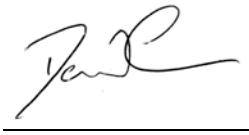
Details of any personal, financial, business or employment relationship with the Auditee, the Auditee's staff, representatives or associated persons. (This is in the context of both the person making the declaration and the organisation that they are employed by -leave blank if none):

Details of any personal, financial, business or employment relationship with the project to be audited (This is in the context of both the person making the declaration and the organisation that they are employed by- leave blank if none):

Details of professional accreditations/memberships:

Environment Institute of Australia and New Zealand (Member)

In making this declaration, I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both. An extract of section 491 of the EPBC Act is attached.

Signed 

Full name (please print) David Curwen

Organisation (please print) URS Australia Pty Ltd

Date *19/ 02/ 2015*

Australian Government

Department of the Environment

AUDITORS DECLARATION OF INDEPENDENCE

I, *[name of auditor]* ***Kate Every***

of *[name of organisation and full address]* ***URS Australia Pty Ltd***

Level 17, 240 Queen Street, Brisbane Queensland 4051

declare that to the best of my knowledge and belief I and my organisation do not have any conflicting or competing interests with:

The Auditee *[name of Auditee]* ***Australia Pacific LNG or Origin Energy***

_____ , the Auditee's staff or representatives or other persons associated with the Auditee, including any personal, financial, business or employment relationship, except to the extent detailed below.

The project to be audited *(name of EPBC Act/Sea Dumping Act project]*

Australia Pacific LNG Project – Walloons gas fields within the Surat Basin in south central Queensland (EPBC 2009/4974)

I shall notify the Department of the Environment within seven days of any change in these circumstances or any other change that may affect my independent status.

I shall at all times observe any professional code of conduct and/or ethics applicable to undertaking audits (i.e. -as prescribed by the agency with which I hold accreditation/membership). I take full responsibility for any factual inaccuracy or mistake made in giving this declaration, particularly to the extent that others rely upon the truth of this declaration. I acknowledge that the Department of the Environment may request further information to verify my independence at any time.

Details of any personal, financial, business or employment relationship with the Auditee, the Auditee's staff, representatives or associated persons. (This is in the context of both the person making the declaration and the organisation that they are employed by -leave blank if none):

Details of any personal, financial, business or employment relationship with the project to be audited (This is in the context of both the person making the declaration and the organisation that they are employed by- leave blank if none):

Details of professional accreditations/memberships:

Environment Institute of Australia and New Zealand (Associate Member)

In making this declaration, I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both. An extract of section 491 of the EPBC Act is attached.

Signed

Full name (please print) Kate Every

Organisation (please print) URS Australia Pty Ltd

Date *19/ 02/ 2015*

APPENDIX D APPROVAL OF URS AS AUDITORS

Australian Government
Department of the Environment

Our reference: 2014/02846

Contact Officer: Ben Corbett
Telephone: (02) 6274 1060
Facsimile: (02) 6274 1878
Email: Audit@environment.gov.au

Mr Rob Ully
Environmental Approvals and Strategy Manager
Origin Energy
GPO Box 484
Brisbane QLD 4001

Dear Mr Ully

Re: Directed audit of the approval granted to develop, construct, operate and decommission coal seam gas resources in the Walloons gas fields within the Surat Basin in south central Queensland – EPBC 2009/4974

Thank you for your letter dated 18 March 2014 regarding the directed scoped independent compliance audit that is to be undertaken of the approval granted to Australia Pacific LNG Pty Limited to develop, construct, operate and decommission coal seam gas resources in the Walloons gas fields within the Surat Basin in south central Queensland – EPBC 2009/4974.

You sought (in accordance with condition 103 a. of the EPBC Act approval) to have URS Australia Pty Ltd (Mr Rob Storrs, Mr David Curwen and Ms Kate Every) appointed as the independent auditor.

This request has been assessed and I am pleased to inform you, as delegate of the Minister for the Environment, that I approve the appointment of URS Australia Pty Ltd as the independent auditor.

Should you have any queries please contact the Director of Approvals Monitoring South Section, Mr Ben Corbett, on 02 6274 1060 or email Audit@environment.gov.au.

Yours sincerely

S. Gaddes

Shane Gaddes
Assistant Secretary
Compliance & Enforcement Branch
Environment Assessment and Compliance Division

12 May 2014

APPENDIX E APPROVAL OF AUDIT CRITERIA

Australian Government
Department of the Environment

Our reference: 14/008248

Contact Officer: Kynan Gowland
Telephone: (02) 6275 9322
Facsimile: (02) 6274 1878
Email: Audit@environment.gov.au

Mr Rob Ully
Environmental Approvals and Strategy Manager
Origin Energy
GPO Box 484
Brisbane QLD 4001

Dear Mr Ully

Directed audit of the approval granted to develop, construct, operate and decommission coal seam gas resources in the Walloons gas fields within the Surat Basin in south central Queensland – EPBC 2009/4974

I refer to the email correspondence received from Mr John Earley on 3 December 2014 submitting revised audit criteria for the directed audit of the abovementioned project. I am pleased to inform you that I approve the proposed audit criteria (version 3) subject to the required amendments which are highlighted as comments in the attached document being addressed. The amendments essentially relate to:

- incorrect references to conditions and condition elements;
- the terms 'Protocol' and 'Plan', which relate to discrete documents, had been incorrectly referred to and used interchangeably throughout the audit criteria;
- lack of detail or errors in the 'requirement' and 'verification method' fields;
- information missing from condition elements and notes; and
- missing information regarding disturbance limits for listed species detailed in Table 3 of condition 25.

I stress that these amendments are required to be taken on board and addressed in the resulting audit report.

You have ten (10) weeks from the date of this letter to conduct the audit and submit the audit report to the Department. I look forward to receiving a copy of the audit report.

Finally, I take this opportunity to remind you of the Department's expectations in terms of audit reports being required to include details of measurements made, sample sizes and audit evidence obtained. In considering the audit evidence obtained:

- there must not be an over-reliance on representations made by the approval holder or their representatives (i.e. audit findings should be based on independently verifiable third party evidence);

- where sample records are referenced (e.g. pre-clearance surveys) a representative random sample of a minimum of 10% of the records must be reviewed; and
- statements that support audit findings must not include terms that are open to interpretation and they must provide sufficient context to inform the basis for audit conclusions (e.g. if it is determined that a measure required by a plan is 'not applicable' from an implementation perspective the finding is to be supported by a statement that confirms why this is the case and that there are no commitments or undertakings contained in the plan that require implementation).

Should you require any further information please contact Kynan Gowland on 02 6275 9322 or email Audit@environment.gov.au.

Yours sincerely

S. Gaddes

Shane Gaddes
Assistant Secretary
Compliance & Enforcement Branch
Environment Assessment and Compliance Division

11 December 2014

GOVERNMENT OIL & GAS INFRASTRUCTURE POWER INDUSTRIAL

URS is a leading provider of engineering, construction, technical and environmental services for public agencies and private sector companies around the world. We offer a full range of program management; planning, design and engineering; systems engineering and technical assistance; construction and construction management; operations and maintenance; and decommissioning and closure services for power, infrastructure, industrial and commercial, and government projects and programs.

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