



Integrated Gas

Australia Pacific LNG Annual Compliance Report EPBC 2017/7902 2019-2020

EPBC 2017/7902 Alfredson Annual Compliance Report 2019-2020

Review record

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1. Purpose

The purpose of this Report is to report on the status of compliance with each condition of EPBC 2017/7902.

Condition 14 of the Approval requires an Annual Compliance Report to be prepared that describes compliance with each condition, identifies any instances of non-compliance, records unavoidable impacts, mitigation measures and rehabilitation of Matters of National Environmental Significance (MNES), and identifies any amendments to plans needed to comply with the conditions of approval. This Report has been prepared in accordance with condition 14.

Condition 14 requires that:

The approval holder must prepare a compliance report for each 12 month period following the date of the approval of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:

- a) publish each compliance report on its website within 60 business days following the relevant 12 month period;*
- b) notify the Department by email that a compliance report has been published on its website within 5 business days of the date of publication;*
- c) keep all compliance reports publicly available on its website for the duration of this approval;*
- d) exclude or redact sensitive ecological data from compliance reports published on its website; and*
- e) where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication.*

Note: Compliance reports may be published on the Department's website.

2. Scope

The reporting period relevant to this report is 2 September 2019 to 1 September 2020 inclusive. The scope of this report includes the progressive development of up to 68 wells and associated infrastructure (gas and water pipelines, access roads, power and communication lines, stockpiles and storage areas) within the Alfredson Block Development area. Compliance with Federal Approvals EPBC 2011/6221, EPBC 2009/4974 and EPBC 2009/4976 are addressed in separate reports.

3. Abbreviations

Definitions for terms and acronyms can be found in Table 1 below.

Table 1: Terms and Acronyms

Term/Acronym	Definition/Expansion
CSG	Coal Seam Gas
Department	Department of Agriculture, Water and the Environment
EPBC Act 1999	Environment Protection and Biodiversity Conservation Act 1999
Ha	hectare
LNG	Liquid Natural Gas
M	metre

Term/Acronym	Definition/Expansion
MNES	Matters of National Environmental Significance
MP	Management Plan
OFI	Opportunities for improvement
PL	Petroleum Lease
PLA	Petroleum Lease Application
RAMP	Revised Action Management Plan
WMMP	Water Monitoring and Management Plan

4. Annual Compliance Report

4.1 Compliance

Compliance with the conditions of EPBC Approval 2017/7902 is set out in Table 2.

4.2 Non-Compliances

There are 4 new non-compliances for the reporting period. No impact to MNES occurred as a result of any identified non-compliances and APLNG has taken action to rectify all matters.

Table 2: Compliance Table - EPBC 2017/7902

Condition No.	Condition	2020 Status	2020 Compliance Statement
Part A - Conditions specific to the action Maximum Impact Limits			
1	The approval holder must not impact more than: a. 5.4 ha of Brigalow (<i>Acacia harpophylla</i> dominant and co-dominant) threatened ecological community. b. 6.1 ha of habitat for snails.	Compliant	a. 0.0153 ha disturbed b. 0.55 ha disturbed
Water Resources - Monitoring and Management Plans			
2	The approval holder must implement the following action management plans for the duration of this approval or as otherwise agreed to in writing by the Minister: a. Groundwater Monitoring Plan; and b. Talinga-Condabri Integrated CSG Water Management Plan.	Compliant	The management plans have been implemented.

Condition No.	Condition	2020 Status	2020 Compliance Statement
3	<p>Within two years of the approval of the action, the approval holder must submit revised versions of the approved action management plans specified in condition 2 for the written approval of the Minister. The revised action management plans must be in accordance with the Department's Environmental Management Plan Guidelines and Coal seam gas water management guidelines, and include, but not limited to:</p> <ul style="list-style-type: none"> a. an assessment of the effectiveness of measures contained in the plans provided in the preliminary documentation in avoiding, monitoring, mitigating and managing impacts on protected matters; b. a detailed comparison of actual impacts on protected matters with impacts predicted in the preliminary documentation; and c. the measures proposed to be implemented, in light of the findings of the analyses required by parts a. and b. above, to monitor groundwater and manage CSG produced water as part of the action. 	N/A	
4	<p>The approval holder must not implement the revised action management plans required under condition 3 until these have been approved in writing by the Minister. The approved revised action management plans must be implemented unless subsequently revised in accordance with one or other provision of conditions 20 - 25.</p>	N/A	

Condition No.	Condition	2020 Status	2020 Compliance Statement
Water Resources - Coal Seam Gas (CSG) Produced Water			
5	All CSG produced water produced by the action must be managed in accordance with the Talinga- Condabri Integrated CSG Water Management Plan and used only for: a. beneficial use of water for construction and rehabilitation activities; b. irrigation and stock watering; and/or c. contingent dam storage.	Compliant	All CSG produced water in the development area was managed in accordance with the plan.
Chemical Risk Assessment			
6	Prior to the use of any new drilling fluid compound, the approval holder must undertake a chemical risk assessment. The chemical risk assessment must be undertaken in accordance with best practice risk assessment methodology.	Compliant	No new drilling fluid compounds have been used.
7	The approval holder must implement the approved chemical risk assessment.	N/A	
8	The approval holder must not use any new drilling fluid compound considered high risk until the chemical risk assessment for that new drilling fluid compound has been approved in writing by the Minister.	N/A	

Condition No.	Condition	2020 Status	2020 Compliance Statement
Part B - Standard administrative conditions Notification of date of commencement of the action			
9	The approval holder must notify the Department in writing of the date of the commencement of the action within 10 business days after the date of the commencement of the action.	Non-compliant	The action commenced on 14 October 2019. The conditions of the approval required the Department to be notified of commencement of the action within 10 business days (28 October 2019). The Department was notified on 30 October 2019. This administrative non-compliance was communicated to the Department.
10	If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the written agreement of the Minister.	N/A	
Compliance Records			
11	The approval holder must maintain accurate and complete compliance records.	Non-compliant	It was identified that an appropriate action to trigger the development of the annual compliance report had not been set up in the compliance system. An action has now been generated and will initiate the compilation and submission of the annual compliance report.

Condition No.	Condition	2020 Status	2020 Compliance Statement
12	<p>If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.</p> <p>Note: Compliance records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the Department's website or through the general media.</p>	N/A	
Preparation and publication of plans			
13	<p>The approval holder must:</p> <ul style="list-style-type: none"> a. submit the plans electronically to the Department for written approval by the Minister; b. publish each plan on its website within 20 business days of the date the plan is approved by the Minister or, in the case of revised action management plans submitted in accordance with condition 22 within 2 business days of the date on which the approval holder will implement the revised action management plan unless the Minister gives a notice under condition 24 in respect of the revised action management plan; c. exclude or redact sensitive ecological data from plans published on its website or provided to a member of the public; and d. keep plans published on its website for the duration of this approval. 	Non-compliant	<p>The management plans were approved as part of the action on 2 September 2019. The plans were required to be published on the website within 20 business days of approval (1 October 2019). The management plans were uploaded to the website on 8 October 2019.</p>

Condition No.	Condition	2020 Status	2020 Compliance Statement
Annual Compliance Reporting			
14	<p>The approval holder must prepare a compliance report for each 12 month period following the date of the approval of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:</p> <ul style="list-style-type: none"> a. publish each compliance report on its website within 60 business days following the relevant 12 month period; b. notify the Department by email that a compliance report has been published on its website within 5 business days of the date of publication; c. keep all compliance reports publicly available on its website for the duration of this approval; d. exclude or redact sensitive ecological data from compliance reports published on its website; and e. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication. <p>Note: Compliance reports may be published on the Department's website.</p>	Non-compliant	The annual compliance report was submitted outside of this timeframe. An action has now been generated in the relevant compliance system to trigger compilation and submission of the report annually.

Condition No.	Condition	2020 Status	2020 Compliance Statement
Reporting Non-compliance			
15	The approval holder must notify the Department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable but no later than 2 business days after becoming aware of the incident or non-compliance. The notification must specify: a. the condition which is or may be in breach; and b. a short description of the incident and/or non-compliance.	Compliant	The approval holder was not aware of any incident, non-compliance with conditions, or non-compliance with commitments made in plans during the reporting period.
16	The approval holder must provide to the Department the details of any incident or noncompliance with the conditions or commitments made in the plans as soon as practicable but no later than 10 business days after becoming aware of the incident or non-compliance, specifying: a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future; b. the potential impacts of the incident or non-compliance; and c. the method and timing of any remedial action that will be undertaken by the approval holder.	N/A	

Condition No.	Condition	2020 Status	2020 Compliance Statement
Independent Audit			
17	The approval holder must ensure that independent audits of compliance with the conditions of approval are conducted when requested in writing by the Minister.	N/A	
18	For each independent audit, the approval holder must: a. provide the name and qualifications of the independent auditor and the draft audit criteria to the Department; b. only commence the independent audit once the audit criteria have been approved in writing by the Department; and c. submit an audit report to the Department within the timeframe specified in the approved audit criteria.	N/A	
19	The approval holder must publish the audit report on its website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on its website for the duration of this approval.	N/A	

Condition No.	Condition	2020 Status	2020 Compliance Statement
Revision of action management plan			
20	The approval holder may apply to the Minister for a variation to the action management plan required under conditions 3 and 5, or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves the revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.	N/A	
21	The approval holder may choose to revise an action management approved by the Minister under conditions 3 and 5, or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the RAMP would not be likely to have a new or increased impact.	N/A	

Condition No.	Condition	2020 Status	2020 Compliance Statement
22	<p>If the approval holder makes the choice under condition 21 to revise an action management plan without submitting it for approval, the approval holder must:</p> <ul style="list-style-type: none"> a. notify the Department in writing that the approved action management plan has been revised and provide the Department with: <ul style="list-style-type: none"> i. an electronic copy of the RAMP; ii. an electronic copy of the revised RAMP marked up with track-changes to show the differences between the approved action management plan and the RAMP; iii. an explanation of the differences between the approved action management plan and the RAMP; iv. the reasons the approval holder considers that taking the action in accordance with the RAMP would not be likely to have a new or increased impact; and v. written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the Department. b. subject to condition 24, implement the RAMP from the RAMP implementation date. 	N/A	
23	<p>The approval holder may revoke its choice to implement the RAMP under condition 21 at any time by giving written notice to the Department. If the approval holder revokes its choice, the approval holder must implement the previous action management plan approved by the Minister.</p>	N/A	

Condition No.	Condition	2020 Status	2020 Compliance Statement
24	<p>If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the RAMP would be likely to have a new or increased impact, then:</p> <p>a. condition 21 does not apply, or ceases to apply, in relation to the RAMP; and</p> <p>b. the approval holder must implement the action management plan specified by the Minister in the notice.</p>	N/A	
25	<p>At the time of giving the notice under condition 24, the Minister may also notify that for a specified period of time, condition 21 does not apply for one or more specified action management plans.</p> <p>Note: conditions 20 to 25 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a RAMP, at any time, to the Minister for approval.</p>	N/A	
Completion of the action			
26	<p>Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.</p>	N/A	

Condition No.	Condition	2020 Status	2020 Compliance Statement
Monitoring Data			
27	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under conditions 2 and 6, is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to the Department in accordance with the requirements of the plans.	N/A	No data was required during the reporting period.

5. Document references

Documents referenced in this Compliance Report are listed below.

Document Number	Title
CDN/ID 8229619	Talinga-Condabri Integrated CSG Water Management Plan.
CDN/ID 11788517	Groundwater Monitoring Plan