

Integrated Gas

EPBC 2017/7881 APLNG SPRING GULLY NORTH-WEST NORTH-EAST

COMPLIANCE REPORT 27 May 2022 - 26 May 2023

Review record

| Rev | Date | Reason for issue | Reviewer/s | Consolidator | Approver |
|-----|------------|---|--------------------|--------------|----------|
| 0 | 14/08/2023 | Issued to meet requirements of EPBC 2017/7881 | L James C Owens | N Whittaker | A Nicoll |

Review due: N/A
Review frequency: N/A

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THE THREE WHATS

What can go wrong?
What could cause it to go
wrong?
What can I do to prevent it?

EPBC 2017/7881 APLNG Spring Gully North-West North-East Compliance Report 2022-2023

Q-8200-01-RP-0018

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1. Purpose

The purpose of this document is to report on compliance with each condition of EPBC Approval 2017/7881.

Condition 27 of EPBC Approval 2017/7881 requires a compliance report to be published on the Australia Pacific LNG website. This report has been prepared in accordance with Condition 27.

Condition 27 states that:

The approval holder must prepare a compliance report for each 12 month period following the date of the commencement of the action, or as otherwise 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. Details of activities and scope

Table 1 sets out the scope and details of the relevant activities subject to EPBC Approval 2017/7881 and this compliance report.

Table 1 Key approval and project details

| Element | Description |
|--|--|
| EPBC number: | 2017/7881 |
| Project Name: | Spring Gully North-West North-East |
| Approval Holder and ABN: | Australia Pacific LNG Pty Limited, 001 646 331 |
| The Approved Action: | To construct, operate and decommission coal seam gas fields totalling up to 114 coal seam gas wells and associated infrastructure (gas and water pipelines, access roads, power and communication, stockpiles and storage areas) in the Spring Gully North-West and North-East development areas, 65 km north-east of Roma in southern Queensland [See EPBC Act referral 2017/7881]. |
| Location of the Project: | 65 km north-east of Roma, Queensland |
| Person Accepting Responsibility for this Report: | Aleta Nicoll |
| Dates for the Reporting Period for the Report: | 27 May 2022 to 26 May 2023 inclusive |
| Date of Preparation of the report: | 14 August 2023 |

Compliance with the conditions of EPBC Approval 2017/7881 are set out in Table 3.

3. Definitions/Acronyms

Definitions and acronyms of terms used in this report are set out in Table 2.

Table 2 Terms and Acronyms

| Term/Acronym | Definition/Expansion |
|---------------------------------|---|
| ACT | Australian Capital Territory |
| Annual Compliance Report | EPBC 2017/7881 APLNG Spring Gully North-West North-East Compliance Report 2022-2023 |
| APLNG | Australia Pacific LNG |
| CDN/ID | Controlled Document Number / Identification |
| CSG | Coal Seam Gas |
| CSGWMP | Coal Seam Gas Water Management Plan |
| Cth | Commonwealth |
| DCCEEW | Department of Climate Change, Energy, the Environment and Water |
| EOW | End of Waste |
| EPBC Act | <i>Environment Protection and Biodiversity Conservation Act 1999</i> |
| GWMP | Groundwater Management Plan |
| ha | hectares |
| km | kilometre |
| LNG | Liquified natural gas |
| MNES | Matters of National Environmental Significance |
| NSW | New South Wales |
| OAMP | Offset Area Management Plan |
| Qld | Queensland |
| RAMP | Revised action management plan |
| UWIR | Underground Water Impact Report |

4. Compliance Findings

Table 3 Compliance findings for EPBC Approval 2017/7881

| Condition Number | Condition | Is the project compliant with this condition? | Evidence/Comments |
|---|---|---|---|
| Part A - Conditions specific to the action | | | |
| Maximum Impact Limits | | | |
| 1 | The approval holder must not clear more than: a. 196.7 hectares (ha) of Koala (<i>Phascolarctos cinereus</i>) (combined populations of Qld, NSW and the ACT) habitat and Greater Glider (<i>Petauroides volans</i>) habitat; and b. 41.1 ha of Squatter Pigeon (Southern) (<i>Geophaps scripta scripta</i>) breeding habitat. | Compliant | Disturbance during the reporting period was limited to approximately 4.88ha. Of this approximately 1.29ha of koala and greater glider habitat was impacted. There was no disturbance impact to squatter pigeon habitat during the reporting period. The total impact to relevant MNES species since the commencement of activities is: a) 49.08 ha cleared of koala and 45.02ha of greater glider habitats b) 2.94 ha cleared of squatter pigeon habitat (no change) |
| 2 | The approval holder must not clear any White-throated Snapping Turtle (<i>Elseya albagula</i>) important habitat during construction. | Compliant | There has been no disturbance to the white-throated snapping turtle (<i>Elseya albagula</i>) important habitat during the reporting period. |
| Offset Area Management Plan | | | |
| 3 | The approval holder must have an offset agreement in effect from the date of the commencement of the action to protect habitat for listed threatened species in the offset area. The offset agreement must be in effect for the duration of this approval. | Compliant | The Tooloombilla offset agreement was in place at commencement of the action and remains in effect as at 26/05/2023. |

| Condition Number | Condition | Is the project compliant with this condition? | Evidence/Comments |
|------------------|--|---|---|
| 4 | The approval holder must implement the Offset Area Management Plan (OAMP) from the date of the commencement of the action. | Non-compliant | <p>APLNG has retained the legal agreement over Tooloombilla property and implemented the original OAMP. The original OAMP was implemented from the date of the commencement of the action. The existing legal agreement for the Tooloombilla property covers over 5,000 ha of MNES values. The agreement precludes clearance of habitat across the property and limits grazing impacts to protect MNES values.</p> <p>During the assessment of the referral the Department raised issues regarding the lack of evidence of presence of Greater Glider on the Tooloombilla property. On this basis the Department provided conditions 7 to 11 to allow for the consideration of an alternative offset site with evidence of presence.</p> <p>On 27/11/2019 a revised OAMP was submitted in accordance with condition 5 proposing an alternate site with demonstrated presence of Greater Glider.</p> <p>Further revisions of this OAMP, were submitted in September and December 2022 to address comments from DCCEEW. Additional feedback has been provided by DCCEEW in February 2023. APLNG is working through the most recent comments and is revising the OAMP for resubmission. APLNG proposes to submit a revised OAMP in October 2023.</p> <p>The management actions in the original OAMP relating to the protection of MNES values are being implemented, however actions relating to the improvement and monitoring the original offset site are not, as an alternative offset site is being proposed.</p> <p>There are no potential impacts to MNES as a result of this non-compliance.</p> |

| Condition Number | Condition | Is the project compliant with this condition? | Evidence/Comments |
|---|--|---|--|
| 5 | The approval holder must submit, for the written approval of the Minister, a revised OAMP within 6 months of the date of the commencement of the action. The revised OAMP must reflect the timing requirements of conditions 7 to 11. The approved OAMP must be implemented. | Not applicable | The submission of the OAMP was completed in a previous reporting period and the non-compliance was previously reported. The revised OAMP is not yet approved and therefore not able to be implemented. |
| 6 | The approval holder must legally secure the offset area within 2 years of the date of the commencement of the action. | Non-compliant | The Tooloombilla offset agreement was in place at commencement. However, the offset area has not been legally secured as the Minister has not yet approved the revised OAMP. There are no potential impacts to MNES as a result of this non-compliance. APLNG has been actively working with the Department on the approval of the OAMP and will continue to do so. |
| Greater Glider (<i>Petauroides volans</i>) - Alternate Offset Area | | | |
| 7 | Within 2 years of the date of the commencement of the action, the approval holder must demonstrate, to the Department's written satisfaction, whether or not the Greater Glider is present in the offset area. | Non-compliant | Presence of the greater glider has been demonstrated on the property in the revised OAMP submitted to the Department on 27/11/2019. The Department has not yet advised whether they are satisfied by the presence of greater glider in the revised offset area. |
| 8 | If the Department is not satisfied that the Greater Glider is present in the offset area, the approval holder must submit a Greater Glider Offset Strategy for the written approval of the Minister. The Greater Glider Offset Strategy must: a. provide details of how the proposed environmental offset/s for the Greater Glider (<i>Petauroides volans</i>) habitat to be impacted as identified in condition 1 meet the principles of the EPBC Act Environmental Offsets Policy, including evidence demonstrating the presence of the Greater Glider; b. and be submitted within 3 months of the Department's written notice that the Department is not satisfied that the Greater Glider is present in the offset area. | Not applicable | The Department has not yet advised whether they are satisfied by the presence of greater glider in the revised offset area. As a result, this condition has not been triggered. |

| Condition Number | Condition | Is the project compliant with this condition? | Evidence/Comments |
|---|---|---|---|
| 9 | The approval holder must submit, for the written approval of the Minister, a Greater Glider Offset Management Plan (GGOMP) within 6 months of the date of the approval of the Greater Glider Offset Strategy. The approved GGOMP must be implemented. | Not applicable | The Department has not yet advised whether they are satisfied by the presence of greater glider in the revised offset area. As a result, this condition has not been triggered. |
| 10 | The GGOMP must be prepared by a suitably qualified person in accordance with the Department's Environmental Management Plan Guidelines and include: a. details of an environmental offset to compensate for the Greater Glider (<i>Petauroides volans</i>) habitat to be impacted as identified in condition 1; b. a description of the condition of the habitat to be impacted for the Greater Glider (<i>Petauroides volans</i>) habitat as identified in condition 1; c. details of how the environmental offset and GGOMP meet the principles of the EPBC Act Environmental Offsets Policy; and d. details of the mechanism to legally secure the environmental offset. | Not applicable | The Department has not advised whether they are satisfied of the presence of greater glider in the revised offset area. As a result, this condition has not been triggered. |
| 11 | The approval holder must legally secure the environmental offset within 4 years of the date of the commencement of the action. | Not applicable | The Department has not advised whether they are satisfied of the presence of greater glider in the revised offset area. As a result, this condition has not been triggered. |
| Listed Threatened Species - Avoidance, Mitigation and Management | | | |
| 12 | The approval holder must implement the Spring Gully North-West and North-East Project Environmental Constraints Planning and Field Development Protocol for the duration of construction. | Non-Compliant | Most of the activities have been completed in accordance with the Spring Gully North-West and North-East Project Environmental Constraints Planning and Field Development Protocol (the Protocol). However, a review of the Project Constraint Categories as part of development design, was not able to be verified as complete. Nonetheless, proposed activities were designed in accordance with the avoid and minimise hierarchy requirements on the Protocol. A revised Protocol is proposed to be submitted to the Department in November 2023. |

| Condition Number | Condition | Is the project compliant with this condition? | Evidence/Comments |
|--|---|---|--|
| 13 | The approval holder must implement the Threatened Species and Ecological Community Management Plan for the duration of this approval. | Compliant | <p>The Threatened Species and Ecological Community Management Plan (Q-8200-15-MP-1158, Rev 3 dated 30/09/22) was revised during the period to address inconsistencies identified and reported as part of the 2022 Annual Compliance Report.</p> <p>The revised plan was submitted to the Department as a 'revised action management plan' in accordance with condition 33 on 30/09/2022.</p> <p>The Threatened Species and Ecological Community Management Plan was implemented during the reporting period.</p> |
| 14 | <p>Water Resources - Coal Seam Gas (CSG) Produced Water</p> <p>The total volume of CSG produced water produced by the action must be managed by:</p> <ul style="list-style-type: none"> a. beneficial use of water for construction and rehabilitation activities; b. irrigation and stock watering; and/or c. contingent dam storage. | Compliant | During the reporting period, all water produced from the action area, was utilised for irrigation. |
| Water Resources - Monitoring and Management Plans | | | |

| Condition Number | Condition | Is the project compliant with this condition? | Evidence/Comments |
|------------------|--|---|--|
| 15 | <p>The approval holder must implement the following plans for the duration of this approval or otherwise agreed to in writing by the Minister:</p> <ul style="list-style-type: none"> a. Groundwater Monitoring Plan; and b. Spring Gully Coal Seam Gas Water Management Plan. | Non-compliant | <p>Minor, technical non-compliances were identified in relation to the implementation of the Groundwater Monitoring Plan (GWMP) (Q-LNG-01-10-MP-0005, Rev 5 dated 11/03/14) and CSG Water Management Plan (CSGWMP) (CDN/ID 69646975, Rev 8 dated 30/11/22).</p> <p>a. One monitoring bore (SG-PB-5), which was installed post the approval of the GWMP, is not able to be monitored for its prescribed water quality parameters, due to how the bore was completed (i.e. reservoir-type completion), which restricts water quality monitoring abilities at this location. As per State obligations under the UWIR, water pressure is monitored at this location and is the only parameter required to be monitored (water quality monitoring is not required).</p> <p>A revised GWMP was submitted to the Department on 26/05/2021. APLNG continues to work with the Department on the approval of this revised plan.</p> <p>b. The CSGWMP requires water sampling and monitoring in accordance with Queensland's General Beneficial Use Approvals (BUAs) that have now been replaced by the Queensland's End of Waste Code (EOW) framework. Monitoring and sampling requirements under the relevant EOW Codes are now implemented for the action, however these vary slightly from those outlined in the approved CSGWMP.</p> <p>A revised CSGWMP was submitted to the Department on 26/05/21. APLNG continues to work with the Department on the approval of this revised plan.</p> <p>There are no impacts to MNES due to these findings as State environmental protections and requirements are being implemented.</p> |

| Condition Number | Condition | Is the project compliant with this condition? | Evidence/Comments |
|---------------------------------|---|---|---|
| 16 | <p>Within 2 years of the date of the commencement of the action, the approval holder must submit revised versions of the approved plans identified in condition 15 for the written approval of the Minister. The revised plans must be in accordance with the Department's Environmental Management Plan Guidelines and include, but not be limited to:</p> <p>a. an assessment of the effectiveness of measures contained in the approved plans in avoiding, monitoring, mitigating and managing impacts on protected matters;</p> <p>b. a detailed comparison of impacts on protected matters against impacts predicted in the preliminary documentation; and</p> <p>c. a timeframe for the regular review of the plans to assess the effectiveness of measures contained in the previous plans in avoiding, monitoring, mitigating and managing impacts on protected matters, including details of the effectiveness of updated local-scale model predictions.</p> | Compliant | <p>Revised versions of the approved plans were submitted within 2 years of the commencement of the action. This was completed in a previous reporting period.</p> <p>APLNG continues to work with the Department on the approval of these revised plans.</p> |
| 17 | The approval holder must not implement the revised plans until the revised plans have been approved by the Minister. The approved revised plans must be implemented. | Non-compliant | <p>As noted in condition 15, minor, technical non-compliances regarding the implementation of the GWMP and CSGWMP have been identified and addressed in revised plans.</p> <p>There are no impacts to MNES due to these findings as State environmental protections and requirements are being implemented.</p> |
| Chemical Risk Assessment | | | |
| 18 | Prior to the use of new drilling fluid compound/s, the approval holder must undertake a chemical risk assessment. The chemical risk assessment must be undertaken in accordance with best practice risk assessment methodology. | Not applicable | No wells have been drilled during the reporting period. |
| 19 | Where a new drilling fluid compound/s is determined by the chemical risk assessment to be high risk, the approval holder must submit the chemical risk assessment for the written approval of the Minister. | Not applicable | No wells have been drilled during the reporting period. |
| 20 | The approval holder must not use the new drilling fluid compound/s considered high risk until the chemical risk assessment has been approved by the Minister. | Not applicable | No wells have been drilled during the reporting period. |

| Condition Number | Condition | Is the project compliant with this condition? | Evidence/Comments |
|---|--|---|---|
| Part B - Standard administration conditions | | | |
| Notification of date of commencement of the action | | | |
| 21 | 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. | Not applicable | Completed during previous reporting period. |
| 22 | 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. | Not applicable | Completed during previous reporting period. |
| Compliance Records | | | |
| 23 | The approval holder must maintain accurate and complete compliance records. | Compliant | All records are being kept within a central document control system/compliance database. |
| 24 | 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. 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. | Compliant | No requests have been made by the Department for compliance records. |
| Preparation and publication of plans | | | |
| 25 | The approval holder must: 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 of the date a revised plan is submitted to the Minister, unless otherwise agreed to in writing by the Minister; 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. | Compliant | a. The plans required by this approval have been submitted to the Department electronically. b. The Threatened Species and Ecological Community Management Plan and CSGWMP were published in accordance with the timeframes of this condition. c. No sensitive ecological data is published on the approval holders website. d. With the exception of plans not approved by the Minister, all plans remain published on the website for the duration of this reporting period. |

| Condition Number | Condition | Is the project compliant with this condition? | Evidence/Comments |
|------------------------------------|--|---|---|
| 26 | The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under conditions 4,5,9, 12, 13, 15 and 17, 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. | Not applicable | No monitoring data is required to be submitted under the plans associated with conditions 4, 5, 9, 12, 13, 15 and 17. |
| Annual Compliance Reporting | | | |
| 27 | <p>The approval holder must prepare a compliance report for each 12-month period following the date of the commencement of the action, or as otherwise agreed to in writing by the Minister.</p> <p>The approval holder must:</p> <ol style="list-style-type: none"> publish each compliance report on its website within 60 business days following the relevant 12-month period; notify the Department by email that a compliance report has been published on its website within 5 business days of the date of publication; keep all compliance reports publicly available on its website for the duration of this approval; exclude or redact sensitive ecological data from compliance reports published on its website; and 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> | Compliant | <p>The 2021-2022 report was published on the APLNG website and is available at this link: https://aplng.com.au/document-library/</p> <p>The publishing of the report and associated notification to the Department were completed within the required timeframes.</p> <p>Each previous Annual Compliance Report remains published on the above website.</p> |
| Reporting Non-compliance | | | |
| 28 | <p>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:</p> <ol style="list-style-type: none"> the condition which is or may be in breach; and a short description of the incident and/or non-compliance. | Compliant | <p>On 8 August 2022, APLNG notified the Department of the non-compliances that had been identified during the preparation of the annual compliance report.</p> <p>On 18 January 2023, APLNG notified the Department of a non-compliance regarding publishing of approval plans on the website.</p> <p>These notifications were made within the required timeframes and included the necessary details to meet this condition.</p> |

| Condition Number | Condition | Is the project compliant with this condition? | Evidence/Comments |
|--|---|---|--|
| 29 | <p>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:</p> <ul style="list-style-type: none"> 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. | Compliant | As part of the notifications made on 8 August 2022 and 23 January 2023, APLNG provided the Department with the details required by this condition. |
| Independent Audit | | | |
| 30 | The approval holder must ensure that independent audits of compliance with the conditions of approval are conducted when requested in writing by the Minister. | Not applicable | No independent audits have been requested by the Minister. |
| 31 | <p>For each independent audit, the approval holder must:</p> <ul style="list-style-type: none"> 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. | Not applicable | No independent audits have been requested by the Minister. |
| 32 | 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. | Not applicable | No independent audits have been requested by the Minister. |
| Revision of action management plans | | | |
| 33 | The approval holder may, at any time, apply to the Minister for a variation to the action management plan approved by the Minister under conditions 5, 9,12,13,15 or 17, 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 | Compliant | The CSGWMP (CDN/ID 69646975, Rev 8 dated 30/11/22) was submitted and approved during the period in accordance with this condition. |

| Condition Number | Condition | Is the project compliant with this condition? | Evidence/Comments |
|------------------|---|---|---|
| 34 | The approval holder may choose to revise an action management approved by the Minister under conditions 12, 13, 15 or 17, 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. | Compliant | The Threatened Species and Ecological Community Management Plan (Q-8200-15-MP-1158, Rev 3 dated 30/09/22) was submitted in accordance with condition 34 to address inconsistencies within the plan. |
| 35 | <p>If the approval holder makes the choice under condition 34 to revise an action management plan without submitting it for approval, the approval holder must:</p> <p>a. notify the Department in writing that the approved action management plan has been revised and provide the Department with:</p> <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. <p>b. subject to condition 38, implement the RAMP from the RAMP implementation date.</p> | Compliant | The Threatened Species and Ecological Community Management Plan (Q-8200-15-MP-1158, Rev 3 dated 30/09/22) was submitted in accordance with condition 35 to address inconsistencies within the plan. |
| 36 | The approval holder may revoke its choice to implement the RAMP under condition 34 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. | Not applicable | APLNG did not revoke its choice to implement a RAMP under condition 34. |

| Condition Number | Condition | Is the project compliant with this condition? | Evidence/Comments |
|---------------------------------|--|---|--|
| 37 | 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: a. condition 34 does not apply, or ceases to apply, in relation to the RAMP; and b. the approval holder must implement the action management plan specified by the Minister in the notice. | Not applicable | The Minister did not provide any notice of new or increased impacts due to the RAMP. |
| 38 | At the time of giving the notice under condition 37, the Minister may also notify that for a specified period of time, condition 34 does not apply for one or more specified action management plans. Note: Conditions 34 to 38 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. | Not applicable | The Minister did not provide any notice of new or increased impacts due to the RAMP. |
| Completion of the action | | | |
| 39 | Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data. | Not applicable | The completion of the action has not been reached. |

5. Compliance with Condition 29

A number of non-compliances of a technical and administrative nature were identified during the internal review conducted for the purpose of this annual report (see section 4 for details). In accordance with condition 29, Table 4 details the corrective actions, potential impacts and remedial actions for the non-compliances identified.

Table 4 The corrective actions, potential impacts and remedial actions for the non-compliances identified in this report

| Condition | Corrective actions | Potential Impacts | Remedial Actions |
|-----------|---|---|--|
| 4 | On 27/11/2019 a revised OAMP was submitted in accordance with condition 5 proposing an alternate site with demonstrated presence of Greater Glider. Following comments from the Department, a revised OAMP is proposed to be submitted in October 2023. The revised OAMP has not yet been approved by the Minister. | The management actions in the original OAMP relating to the protection of MNES values are being implemented within the offset property. | APLNG will continue to work with the Department on the approval of the revised OAMP. |
| 6 | The Tooloombilla offset agreement was in place at commencement. The offset area has not been legally secured as the Minister has not approved the revised OAMP. A revised OAMP is proposed to be submitted to the Department in October 2023. Following approval of the OAMP, APLNG will legally secure the offset property, | The management actions in the original OAMP relating to the protection of MNES values are being implemented within the offset property. | APLNG will continue to work with the Department on the approval of the revised OAMP. |
| 7 | No corrective action is proposed. Presence of Greater Glider has been demonstrated on the property in the revised OAMP submitted to the Department on 27/11/2019. The Department has not written to advise of their satisfaction of the presence of Greater Glider in the revised offset area. | There are no potential impacts to MNES as a result of this non-compliance. | APLNG awaits written advice from the Department that they are satisfied with the presence of greater glider within the proposed offset property. |

| Condition | Corrective actions | Potential Impacts | Remedial Actions |
|-----------|---|---|--|
| 12 | APLNG proposes to submit a revised Spring Gully North-West and North-East Project Environmental Constraints Planning and Field Development Protocol to better reflect the data and process utilised to design activities associated with the action. It is proposed that the revised Protocol will be submitted in November 2023. | Proposed activities were designed in accordance with the avoid and minimise hierarchy requirements on the Protocol. APLNG does not believe that the lack of review using the Project Constraint Categories has resulted in an impact to MNES. | APLNG will work with the Department on the approval of the revised Spring Gully North-West and North-East Project Environmental Constraints Planning and Field Development Protocol. |
| 15 & 17 | Revised management plans have been submitted that will correct the minor, technical non-compliances identified within the GWMP and CSGWMP. | There are no potential impacts to MNES as a result of this non-compliance. State environmental protections and requirements were implemented. | APLNG will continue to work with the Department on the approval of the revised plans. |

6. New Environmental Risks

There have been no new environmental risks identified during the relevant reporting period.

7. Declaration of Accuracy

Declaration of accuracy

In making this declaration, I am aware that sections 490 and 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed: 

Full name (please print): Aleta Nicoll

Position (please print): General Manager, Asset West

Organisation (please print including ABN/ACN if applicable):

Australia Pacific LNG Pty Limited, ACN 001 646 331

Date 14/08/2023