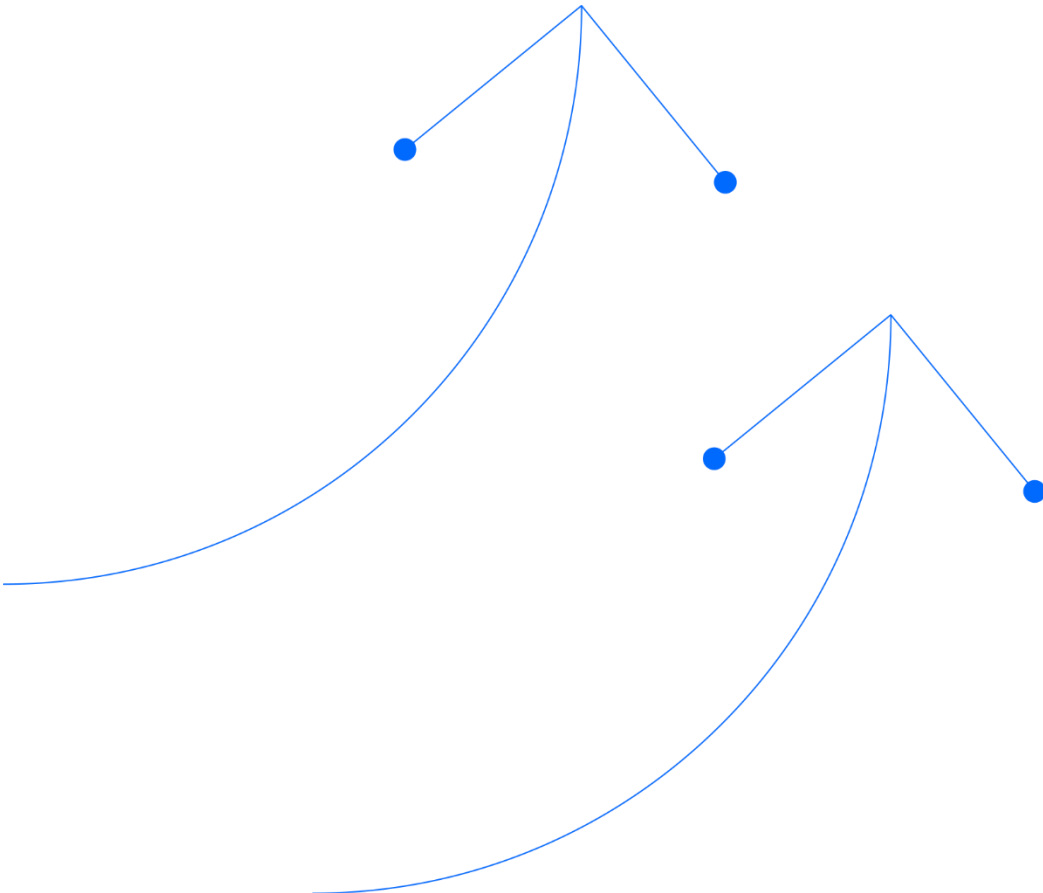


**Santos**

**EPBC APPROVALS  
NO. 2021/8979  
SANTOS TOWRIE GAS  
DEVELOPMENT  
ANNUAL  
COMPLIANCE  
REPORT 2024**

22 August 2024



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## 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	David Gornall
Position	Manager Environment – EA PNG
Organisation	Santos CSG Pty Ltd (ABN 72 121 188 654)
Date	05/07/2024

# 1. Introduction

On 17 February 2023, Santos CSG Pty Ltd (Santos) received approval to construct, operate, decommission and rehabilitate up to 116 gas wells and supporting infrastructure near Arcadia Valley within the Surat Basin, Queensland, for an operational life of approximately 30 years followed by progressive rehabilitation as described in referral EPBC No. 2021-8979 (EPBC Approval).

The 2024 Annual Environmental Return (2024 AER) has been developed to satisfy Condition 38 through Condition 41 of the EPBC Approval.

Condition 38 states:

*“38. The approval holder must, within 3 months of the anniversary of the commencement of the Action, prepare a compliance report for each 12-month period following the date of this approval, or as otherwise agreed to in writing by the Minister.”*

Condition 39 states:

*“39. The approval holder must ensure that each compliance report is consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2014.”*

Condition 40 states:

*“40. The approval holder must ensure that each compliance report includes:*

- a. Accurate and complete details of compliance and any non-compliance with the conditions and the plans, and any incidents.*
- b. One or more shapefile showing all clearing of any protected matters, and/or their habitat, undertaken within the 12-month period at the end of which that compliance report is prepared.*
- c. A schedule of all plans in existence in relation to these conditions and accurate and complete details of how each plan is being implemented.*
- d. Additional information as stated under section 10.6 of the JIF for annual compliance reporting.”*

Condition 41 states:

*“41. The approval holder must:*

- a. Publish each compliance report on the website within 60 business days following the end of the 12-month period for which that compliance report is required.*
- b. Notify the department electronically, within 5 business days of the date of publication that a compliance report has been published on the website.*
- c. Provide the weblink for the compliance report in the notification to the department.*
- d. Keep all published compliance reports required by these conditions on the website until the expiry date of this approval.*
- e. Exclude or redact sensitive ecological data from compliance reports published on the website or otherwise provided to a member of the public.*
- f. If sensitive ecological data is excluded or redacted from the published version, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website.”*

The date of commencement of the action was 24 May 2023. The relevant anniversary date of the EPBC Approval for the purposes of the 2024 AER is 17 February 2024.

The 2024 AER covers the period 17 February 2023 – 16 February 2024 (AER period).

Section 2 documents how compliance has been met with Condition 40 during the AER period.

## **2. Compliance**

### **2.1. Compliance with Conditions – Condition 40(a)**

Condition 40 states:

*40. The approval holder must ensure that each compliance report includes:*

- g. Accurate and complete details of compliance and any non-compliance with the conditions and the plans, and any incidents.*

Table 1 provides detail of Santos' compliance with the conditions and plans relevant to the EPBC Approval during the AER period.

There were no non-compliances or incidents during the AER period.

### **2.2. Shapefile Showing Clearing Areas – Condition 40(b)**

Condition 40 states:

*40. The approval holder must ensure that each compliance report includes:*

- h. One or more shapefile showing all clearing of any protected matters, and/or their habitat, undertaken within the 12-month period at the end of which that compliance report is prepared.*

A shapefile showing all clearing of any protected matters, and/or their habitat, undertaken within the 12-month period at the end of which this compliance report has been prepared, has been provided to the Department. The cleared areas are illustrated on Figure 1.

### **2.3. Schedule of Plans – Condition 40(c)**

Condition 40 states:

*40. The approval holder must ensure that each compliance report includes:*

- i. A schedule of all plans in existence in relation to these conditions and accurate and complete details of how each plan is being implemented.*

The Constraints Planning and Field Development Protocol, Environmental Management Plan, Significant Species Management Plan and Rehabilitation Monitoring Plan are published on the Santos website. Table 1 provides details of how each plan is being implemented.

### **2.4. Additional Information as under the Joint Industry Framework (JIF) – Condition 40(d)**

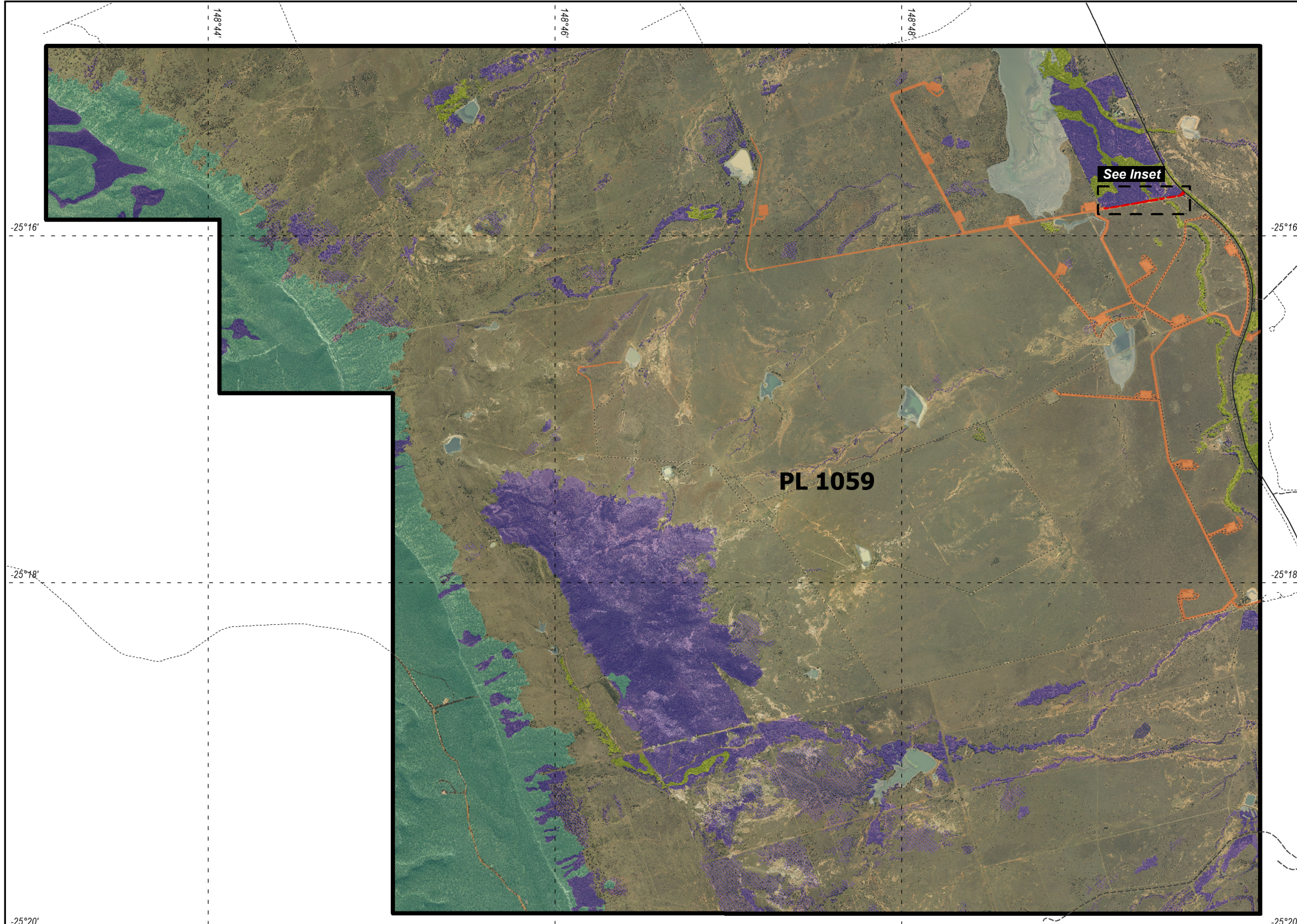
Condition 40 states:

*40. The approval holder must ensure that each compliance report includes:*

- j. Additional information as stated under section 10.6 of the JIF for annual compliance reporting.*

Additional information as stated under section 10.6 of the JIF for annual compliance reporting has been provided in Table 1.

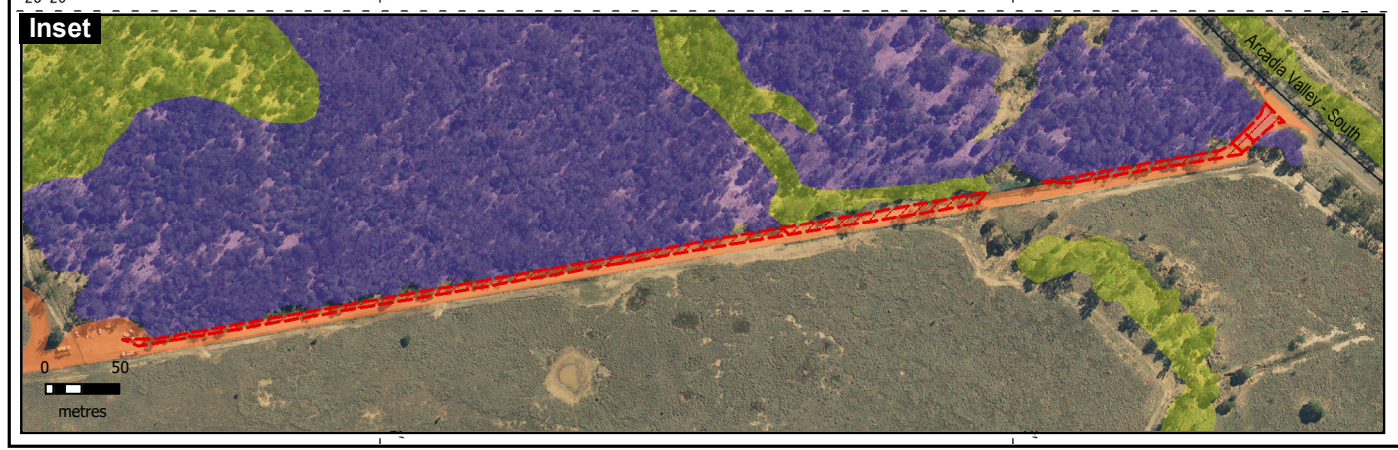
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- Legend**
- Sealed road
  - Unsealed road
  - Track
  - Clearing of Protected matters
  - 2023 Disturbance (EPBC) (51.05Ha)
  - PL 1059 (EPBC 2021/8979)

- Biodiversity Status**
- Endangered - dominant
  - Endangered - sub-dominant
  - Of concern - dominant
  - Of concern - sub-dominant
  - No concern at present
  - Water

- Mature Regrowth**
- Endangered - dominant
  - Endangered - sub-dominant
  - Of concern - dominant
  - Of concern - sub-dominant
  - No concern at present



**Santos**  
GLNG

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Queensland

**PL 1059**  
**EPBC 2021/8979**

0 2  
kilometres

Rev 1      Date: 3/06/2024      File No. ENVIR 1018.WOR

**Table 1: Compliance with Conditions of EPBC Act Approval No. 2021/8979**

Condition	Is the project compliant with the condition?	Evidence / Comments
<i>Part A – Conditions Specific to the Action</i>		
<i>Maximum Disturbance Limits</i>		
1. The approval holder must implement the <b>Constraints Planning and Field Development Protocol</b> for the duration of the approval.	Compliant	Constraints Planning and Field Development Protocol has been implemented for all disturbance activities that occurred within the reporting period.
2. The approval holder must not undertake the Action outside the <b>project area</b> .	Compliant	All actions taken inside the project area for the reporting period.
3. The approval holder must not construct more than 116 coal seam gas production wells as a result of the Action, for an operational life of approximately 30 years followed by progressive rehabilitation.	Compliant	The number of coal seam gas production wells has not exceeded 116. Progressive rehabilitation will begin once the wells have been operational for approximately 30 years.
4. The approval holder must not <b>clear</b> more than: a. 2.0 ha of <b>Brigalow TEC</b> . b. 2.0 ha of <b>Ornamental Snake habitat</b> .	Compliant	During the reporting period, there was: <ul style="list-style-type: none"> <li>• 0.04 ha of Brigalow TEC disturbed; and</li> <li>• no disturbance of Ornamental Snake habitat.</li> </ul>
<i>Management Plans</i>		
5. The approval holder must implement the <b>Environmental Management Plan</b> for the duration of the approval.	Compliant	The Environmental Management Plan has been implemented during the reporting period.
6. The approval holder must implement the <b>Significant Species Management Plan</b> for the duration of the approval.	Compliant	The Significant Species Management Plan has been implemented during the reporting period.
<i>Rehabilitation Plan</i>		
7. The approval holder must implement the <b>Rehabilitation Monitoring Plan</b> for the duration of the approval.	Compliant	The Rehabilitation Monitoring Plan has been implemented during the reporting period.
<i>Chemical Risk Assessment Framework</i>		
8. To assess and manage <b>impacts to protected matters</b> from <b>chemicals</b> , the approval holder must implement the <b>Chemical Risk Assessment Framework (CRAF)</b> for the duration of the approval.	Compliant	The CRAF has been implemented during the reporting period.

Condition	Is the project compliant with the condition?	Evidence / Comments
9. The approval holder must publish the <b>CRAF</b> and Register of Assessed Chemicals on its <b>website</b> prior to the <b>commencement of the Action</b> and ensure the <b>CRAF</b> and Register of Assessed Chemicals remain published on the <b>website</b> for the remaining duration of the approval.	Compliant	The CRAF and Register of Assessed Chemicals was published on the website on 18 May 2023, which was prior to the date of commencement of the action which was 24 May 2023. The CRAF and Register of Assessed Chemicals has remained published on the website for the duration of the reporting period.
10. The approval holder may, at any time, submit a revised <b>CRAF</b> to the <b>Minister</b> for written approval.	Compliant	No revision to the CRAF was required during the reporting period.
11. The approval holder must not use a <b>low-risk chemical</b> until that <b>chemical's</b> risk assessment has been recorded in the Register of Assessed Chemicals and provided to the <b>department</b> as required by the <b>CRAF</b> .	Compliant	All low-risk chemicals used during the reporting period have been recorded in the Register of Assessed Chemicals and provided to the Department as required by the CRAF.
12. In accordance with the <b>CRAF</b> , the approval holder must not use a <b>high-risk chemical</b> until the <b>Minister</b> has approved a risk assessment for that <b>chemical</b> in writing and the risk assessment has been recorded in the Register of Assessed Chemicals as required by the <b>CRAF</b> .	Compliant	All high-risk chemicals used during the reporting period have been recorded in the Register of Assessed Chemicals and provided to the Department as required by the CRAF.
13. The approval holder must engage a <b>chemical risk assessment expert</b> to peer review all risk assessments at least once every 5 years, commencing from the date of this approval. The peer review of all risk assessments must be completed before the end of each 5-year anniversary of the date of this approval. The peer review must include: <ul style="list-style-type: none"> <li>a. an assessment of whether all risk assessments on the Register are consistent with current scientific knowledge;</li> <li>b. an evaluation of the adequacy of relevant monitoring, mitigation and management measures that have been implemented by the approval holder; and</li> <li>c. an explanation of how the approval holder will address or has addressed any concerns raised by the peer review.</li> </ul>	Not applicable	A peer review by a chemical risk assessment expert has not been triggered during the reporting period.



Condition		Is the project compliant with the condition?	Evidence / Comments				
14. The approval holder must, within 60 <b>business days</b> of the completion of the peer review, submit to the <b>department</b> a signed statement by the <b>chemical risk assessment expert</b> detailing the findings of the 5-year peer review and provide evidence demonstrating how all concerns raised by the peer review have been, or will be, addressed.		Not applicable	The peer review has not been triggered during the reporting period.				
<i>Surat CMA Joint Industry Framework</i>							
15. For the protection of <b>water resources</b> and <b>EPBC-listed springs</b> within the <b>Surat CMA</b> , the approval holder must ensure that the outcomes and sub-outcome/s specified in the table below are achieved and maintained:		Compliant	The outcomes and sub-outcomes for the protection of water resources and EPBC-listed springs within the Surat CMA are being achieved and maintained. As specified in the EPBC referral document, there are no EPBC-listed springs within the Project area.				
Controlling Provision	Sections 18 and 18A of the EPBC Act			Sections 24D and 24E of the EPBC Act			
Protected matter or associated user of the protected matter	EPBC-listed springs			Water supply bores	Aquatic GDEs	Terrestrial GDEs	Subterranean GDEs
Outcome	Groundwater <b>impacts</b> due to CSG <b>development</b> must have no impact on the <b>EPBC-listed springs</b> . No <b>impact</b> is achieved by <b>maintaining</b> or enhancing groundwater discharge and <b>environmental values</b> at <b>EPBC-listed springs</b> .			Conditions within unconsolidated and consolidated hydrogeological units, including water level/pressure and water quality, maintain or improve <b>ecosystem services</b> and access by associated users.			
Sub-outcome	None	Water supply bore continues to supply water for its intended purpose,	<b>No adverse effects</b> on the <b>function</b> and <b>environmental values</b> due to CSG development.	<b>No adverse effects</b> to ensure <b>stygo fauna habitat</b> is maintained or improved.			

Condition	Is the project compliant with the condition?	Evidence / Comments					
<table border="1" data-bbox="136 293 840 357"> <tr> <td data-bbox="136 293 255 357"></td> <td data-bbox="255 293 396 357"></td> <td data-bbox="396 293 501 357">or is made good.</td> <td data-bbox="501 293 707 357"></td> <td data-bbox="707 293 840 357"></td> </tr> </table> <p data-bbox="136 363 840 481"><i>Note: The approval holder is considered to have achieved and maintained an outcome for <b>water resources</b> within the <b>Surat CMA</b> when it has achieved and maintained the corresponding sub-outcome/s for <b>water resources</b>.</i></p>			or is made good.				
		or is made good.					
<p data-bbox="136 497 840 641">16. To ensure the outcomes in Condition 15 are achieved and maintained, the approval holder must manage <b>impacts</b> on <b>water resources</b> and <b>EPBC-listed springs</b> in accordance with the <b>relevant risk management framework/s</b>.</p>	Compliant	Impacts on water resources and EPBC listed springs is managed in accordance with the risk management framework.					
<p data-bbox="136 660 840 896">17. If, at any time during the period for which this approval has effect, an <b>impact/s</b> potentially occurring within the approval holder's <b>project area</b> is, or has been, identified as a <b>high-risk</b> or <b>very high-risk impact</b> in accordance with the <b>relevant risk management framework/s</b>, the approval holder must notify the <b>department</b> within 20 <b>business days</b> of becoming aware of that risk.</p>	Not applicable	There are no EPBC-listed springs within the Project area. As such, there have been no impacts to springs which have required notification to the Department during the approval period.					
<p data-bbox="136 916 840 1417">18. Within 9 months (or a timeframe otherwise agreed to by the <b>Minister</b> in writing) of notifying the <b>department</b> of a <b>high-risk or very high-risk impact</b>, the approval holder must provide for the written approval of the <b>Minister</b>:</p> <ul style="list-style-type: none"> <li data-bbox="230 1072 840 1129">a. A detailed description, the level and the location of the <b>impact/s</b> and associated users;</li> <li data-bbox="230 1136 840 1168">b. performance criteria;</li> <li data-bbox="230 1174 840 1206">c. trigger values;</li> <li data-bbox="230 1212 840 1244">d. limits; and</li> <li data-bbox="230 1251 840 1308">e. the <b>contributing well/s</b>, including identification number, GPS coordinates and <b>shapefiles</b>.</li> </ul> <p data-bbox="136 1315 840 1417">or submit to the <b>department</b> for the written agreement of the <b>Minister</b> a statement as to why the provision of <b>performance criteria, trigger values, limits</b> and <b>contributing well/s</b> is not necessary.</p>	Not applicable	There are no EPBC-listed springs within the Project area. As such, there have been no impacts to springs which have required notification to the Department during the approval period.					

Condition	Is the project compliant with the condition?	Evidence / Comments
<p>19. If the Minister advises the approval holder in writing that a statement provided under Condition 18 will not be agreed to by the <b>Minister</b>, the approval holder must provide, within the timeframe specified by the <b>Minister</b> in writing, the description and location of <b>impact/s</b> and associated users, <b>performance criteria, trigger values, limits</b> and <b>contributing well/s</b> for the written approval of the <b>Minister</b>.</p>	<p>Not applicable</p>	<p>This condition was not triggered during the reporting period.</p>
<p>20. When submitted to the <b>Minister</b>, a description and location of <b>impact/s</b> and associated users, <b>performance criteria, trigger values, limits</b> and <b>contributing well/s</b>, or statement provided under Condition 18 must be accompanied by a <b>site-specific assessment</b> prepared by a <b>suitably qualified water resources expert</b> and a peer review undertaken by an <b>independent suitably qualified water resources expert</b>.</p> <p><i>Note: The approval holder may submit a <b>SIMS mitigation plan</b> as its <b>site-specific assessment</b> for <b>EPBC-listed springs</b> and <b>aquatic GDEs</b> provided that it meets the requirements of the <b>site-specific assessment</b>. Where a <b>SIMS mitigation plan</b> is determined by the <b>Minister</b> in writing to meet the requirements of the <b>site-specific assessment</b>, the <b>SIMS mitigation plan</b> is taken to be peer reviewed and therefore does not need to be accompanied by a <b>site-specific assessment</b> prepared by a <b>suitably qualified water resources expert</b>.</i></p>	<p>Not applicable</p>	<p>This condition was not triggered during the reporting period.</p>
<p>21. If the information specified in Condition 18a to 18e has not been approved by the <b>Minister</b> in writing within 6 months of being submitted to the <b>department</b>, the approval holder must undertake impact management in accordance with any interim <b>performance criteria, trigger values</b> and <b>limits</b> set by the <b>Minister</b> in writing.</p> <p><i>Note: The approval holder will only be required to undertake impact management in accordance with interim <b>performance criteria, trigger values</b> and <b>limits</b> where the <b>Minister</b> is not satisfied that the information specified in Conditions 18a to 18e will ensure the outcome/s specified under Condition 15 will be, or is likely to be, achieved.</i></p> <p><i>Note: The <b>Minister</b>, in determining whether to direct the approval holder to undertake impact management in accordance with interim <b>performance</b></i></p>	<p>Not applicable</p>	<p>This condition was not triggered during the reporting period.</p>

Condition	Is the project compliant with the condition?	Evidence / Comments
<p><i>criteria, trigger values and limits, will consider all relevant information including but not limited to legislation and policy, information provided by the approval holder under Condition 18 and Condition 20, and any other relevant information available to the <b>Minister</b> at the time of the decision.</i></p>		
<p>22. The approval holder must undertake impact management in accordance with the interim <b>performance criteria, trigger values and limits</b> until the <b>performance criteria, trigger values and limits</b> required under Condition 18 are approved by the <b>Minister</b> in writing.</p>	Not applicable	This condition was not triggered during the reporting period.
<p>23. The approval holder must submit an <b>Outcomes Assurance Statement</b> for each <b>high-risk or very high-risk impact</b> to the <b>Minister</b> for each 12-month period:</p> <ul style="list-style-type: none"> <li>a. following the date of approval of the description and location of <b>impact/s</b> and associated users, <b>performance criteria, trigger values and limits</b>; or</li> <li>b. following the date the <b>Minister</b> notified the approval holder in writing that interim <b>performance criteria, trigger values and limits</b> had been set; or</li> <li>c. following a date otherwise agreed to in writing by the <b>Minister</b>.</li> </ul> <p>The <b>Outcomes Assurance Statement</b> must be submitted in accordance with reporting requirements specified in the <b>JIF</b>.</p>	Not applicable	This condition was not triggered during the reporting period.
<p>24. The approval holder must provide any additional information requested by the <b>Minister</b> in writing, within the timeframe specified by the <b>Minister</b> in writing, to substantiate an <b>Outcomes Assurance Statement</b> and/or to verify the risk of not achieving the outcome/s specified in Condition 15.</p> <p><i>Note: The <b>Minister</b> may throughout the life of this approval seek advice from experts, or an expert panel. As a consequence, specific matters identified through such advice may need to be addressed in the <b>site-specific assessment</b> or any <b>Outcomes Assurance Statement</b>. Where</i></p>	Not applicable	This condition was not triggered during the reporting period.

Condition	Is the project compliant with the condition?	Evidence / Comments
<p><i>such advice is sought, the approval holder will be provided with the opportunity to submit information and respond to the specific matters identified, in order to ensure <b>Outcomes Assurance Statements</b> are based on the best available information. Review requirements will facilitate adaptive management, align with Queensland Government approval requirements, and account for potential cumulative impacts as new scientific information becomes available over the life of this approval.</i></p>		
<p>25. If the <b>Minister</b> believes on the basis of the <b>Outcomes Assurance Statement</b>, any information provided under Condition 26 and any other relevant information that the outcomes in Condition 15 are not likely to be achieved, the <b>Minister</b> may notify the approval holder in writing specifying the areas requiring improvement or additional information.</p> <p>If notified, the approval holder must develop and implement adaptive management responses to address the specified areas and provide a written report to the <b>Minister</b> within three [3] months of the notification setting out the responses and their effectiveness.</p> <p><i>Note: If there is an exceedance of a limit, Condition 27 requires this to be reported to the <b>Minister</b> and Condition 28 requires the approval holder to <b>cease groundwater extraction</b> within 10 <b>business days</b> of that notification.</i></p>	Not applicable	This condition was not triggered during the reporting period.
<p>26. If the approval holder detects that an approved or interim <b>trigger value</b> has been exceeded, the approval holder must implement an appropriate management response to ensure no approved or interim <b>limits</b> are exceeded.</p> <p>The approval holder must report any exceedance of an approved or interim <b>trigger value</b>, and the <b>contributing well/s</b>, to the <b>department</b> within <b>10 business days</b> of detecting the exceedance of an approved or interim <b>trigger value</b>.</p>	Not applicable	This condition was not triggered during the reporting period.
<p>27. If the approval holder detects that a <b>limit</b> has been exceeded, the approval holder must report this and the <b>contributing well/s</b> to the <b>department</b> within 10 <b>business days</b> of detecting that the <b>limit</b> has been exceeded.</p>	Not applicable	This condition was not triggered during the reporting period.

Condition	Is the project compliant with the condition?	Evidence / Comments
<p>28. Unless otherwise notified by the <b>Minister</b> in writing, the approval holder must cease <b>groundwater extraction</b> associated with the <b>contributing well/s</b> identified in Condition 27 within 10 <b>business days</b> of an exceedance of a <b>limit</b> being reported to the <b>department</b>, or of receiving notification that the <b>Minister</b> has determined that an outcome specified under Condition 15 has not been achieved.</p> <p><i>Note: The <b>Minister</b>, in determining whether to give notice to the approval holder that it is not required to <b>cease groundwater extraction</b>, will consider all relevant information including but not limited to legislation and policy, information provided by the approval holder (including any submissions made by the approval holder on alternative corrective actions that it proposes to take) and any other information available to the <b>Minister</b> at the time of the decision.</i></p>	Not applicable	This condition was not triggered during the reporting period.
<p>29. If the approval holder has been required to <b>cease groundwater extraction</b> pursuant to Condition 28, the approval holder must urgently implement corrective actions to reduce <b>performance criteria</b> below approved or interim <b>limits</b> and <b>trigger values</b>. The approval holder must not recommence <b>groundwater extraction</b> until:</p> <ol style="list-style-type: none"> <li>a. the <b>impact</b> has been <b>reversed</b>; or</li> <li>b. the <b>Minister</b> has agreed, in writing, that the outcome/s specified in Condition 15 has been achieved; and</li> <li>c. written approval to recommence <b>groundwater extraction</b> has been given by the <b>Minister</b>.</li> </ol> <p><i>Note: Approval to recommence <b>groundwater extraction</b> may be subject to conditions that the <b>Minister</b> considers reasonable.</i></p>	Not applicable	This condition was not triggered during the reporting period.
<i>Revision, Submission and Publication of Plans</i>		
<p>30. The approval holder must</p> <ol style="list-style-type: none"> <li>a. submit all <b>plans</b> required by these conditions electronically to the <b>department</b>.</li> </ol>	Compliant	<p>All plans required by these conditions have been electronically submitted to the Department.</p> <p>All plans were published on the website on 20 April 2023, which was within 20 business days of the date of this approval. Sensitive</p>

Condition	Is the project compliant with the condition?	Evidence / Comments
<p>b. publish each <b>plan</b> on the <b>website</b> within 20 <b>business days</b> of the date:</p> <ul style="list-style-type: none"> <li>i. of this approval, if the version of the <b>plan</b> to be implemented is specified in these conditions; or</li> <li>ii. the <b>plan</b> is approved by the <b>Minister</b> in writing, if the <b>plan</b> requires the approval of the <b>Minister</b>.</li> <li>iii. The approval holder is required to exclude or redact <b>sensitive ecological data</b> from <b>plans</b> published on the <b>website</b> or otherwise provided to a member of the public.</li> <li>iv. keep <b>plans</b> required by these conditions published on the <b>website</b> until the expiry date of this approval.</li> </ul> <p><i>Note: The approval holder may, at any time, apply to the <b>Minister</b> for a variation to <b>plan</b> approved by the <b>Minister</b> or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the <b>EPBC Act</b>. If the <b>Minister</b> approves a revised <b>plan</b> then, from the date specified, the approval holder must implement the revised <b>plan</b> in place of the previous <b>plan</b>.</i></p>		<p>ecological data was redacted from plans. The plans have remained published on the website during the reporting period.</p>
<p><i>Part B – Administrative Conditions</i></p>		
<p><i>Notification of Date of Commencement of the Action</i></p>		
<p>31. The approval holder must notify the <b>department</b> electronically of the date of <b>commencement of the Action</b>, within 5 <b>business days</b> of <b>commencement of the Action</b>.</p>	<p>Compliant</p>	<p>The action commenced on 24 May 2023. The department was notified via letter electronically on 25 May 2023.</p>
<p>32. If the <b>commencement of the Action</b> does not occur within 5 years from the date of this approval, then the approval holder must not <b>commence the Action</b> without the prior written agreement of the <b>Minister</b>.</p>	<p>Not applicable</p>	<p>Approval was granted on 17 February 2023. The action commenced 24 May 2023.</p>
<p><i>Compliance Records</i></p>		
<p>33. The approval holder must maintain accurate and complete <b>compliance records</b>.</p>	<p>Compliant</p>	<p>Accurate and complete compliance records were maintained during the reporting period.</p>

Condition	Is the project compliant with the condition?	Evidence / Comments
<p>34. If the <b>department</b> makes a request in writing, the approval holder must provide electronic copies of <b>compliance records</b> to the <b>department</b> within the timeframe specified in the request.</p> <p><i>Note: <b>Compliance records</b> may be subject to audit by the <b>department</b>, or by an <b>independent</b> auditor in accordance with section 458 of the <b>EPBC Act</b>, and/or be used to verify compliance with the conditions. Summaries of the results of an audit may be published on the <b>department's</b> website or through the general media.</i></p>	Compliant	There were no requests received from the department during the reporting period.
<p>35. The approval holder must ensure that any <b>monitoring data</b> (including <b>sensitive ecological data</b>), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the <i>Guidelines for biological survey and mapped data</i>, Commonwealth of Australia 2018, or as otherwise specified by the <b>Minister</b> in writing.</p>	Not applicable	There was no new monitoring data during the reporting period. Sensitive ecological data provided as part of the approval was prepared in accordance with the <i>Guidelines for biological survey and mapped data</i> , Commonwealth of Australia 2018.
<p>36. The approval holder must ensure that any <b>monitoring data</b> (including <b>sensitive ecological data</b>), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the <b>department's Guide to providing maps and boundary data for EPBC Act projects</b>, Commonwealth of Australia 2021, or as otherwise specified by the <b>Minister</b> in writing.</p>	Not applicable	There was no new monitoring data during the reporting period. Sensitive ecological data provided as part of the approval was prepared in accordance with the <i>Guidelines for biological survey and mapped data</i> , Commonwealth of Australia 2018.
<p>37. The approval holder must submit all <b>monitoring data</b> (including <b>sensitive ecological data</b>), surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the <b>department</b> within 12 months of the approval, or in accordance with the requirements of the <b>JIF</b> and <b>CRAF</b>.</p>	Not applicable	There was no new monitoring data during the reporting period. All other activities were undertaken in accordance with the JIF and CRAF during the reporting period.
<i>Annual Compliance Records</i>		
<p>38. The approval holder must, within 3 months of the anniversary of the <b>commencement of the Action</b>, prepare a <b>compliance report</b> for each 12-month period</p>	Compliant	This compliance report has been prepared within 3 months of the anniversary of the commencement of the Action and covers the 12-month period following the date of approval.



Condition	Is the project compliant with the condition?	Evidence / Comments
<p>following the date of this approval, or as otherwise agreed to in writing by the <b>Minister</b>.</p>		
<p>39. The approval holder must ensure that each <b>compliance report</b> is consistent with the <i>Annual Compliance Report Guidelines</i>, Commonwealth of Australia 2014.</p>	Compliant	<p>This compliance report is consistent with the <i>Annual Compliance Report Guidelines</i>, Commonwealth of Australia 2014.</p>
<p>40. The approval holder must ensure that each <b>compliance report</b> includes:</p> <ul style="list-style-type: none"> <li>a. Accurate and complete details of compliance and any non-compliance with the conditions and the <b>plans</b>, and any <b>incidents</b>.</li> <li>b. One or more <b>shapefile</b> showing all <b>clearing</b> of any <b>protected matters</b>, and/or their habitat, undertaken within the 12-month period at the end of which that <b>compliance report</b> is prepared.</li> <li>c. A schedule of all <b>plans</b> in existence in relation to these conditions and accurate and complete details of how each plan is being implemented.</li> <li>d. Additional information as stated under section 10.6 of the <b>JIF</b> for annual compliance reporting.</li> </ul>	Compliant	<p>This compliance report provides details of compliance with the conditions and the plans, details of any incidents, a schedule of plans, and any additional information as stated in the JIF. Figure 1 illustrates areas of protected matters and/or their habitat which have been cleared during the reporting period, and a shapefile of these areas has been provided to the Department.</p>
<p>41. The approval holder must:</p> <ul style="list-style-type: none"> <li>a. Publish each <b>compliance report</b> on the <b>website</b> within 60 <b>business days</b> following the end of the 12-month period for which that <b>compliance report</b> is required.</li> <li>b. Notify the <b>department</b> electronically, within 5 <b>business days</b> of the date of publication that a <b>compliance report</b> has been published on the <b>website</b>.</li> <li>c. Provide the weblink for the <b>compliance report</b> in the notification to the <b>department</b>.</li> <li>d. Keep all published <b>compliance reports</b> required by these conditions on the <b>website</b> until the expiry date of this approval.</li> </ul>	Compliant	<p>This compliance report will be published on the Santos website within 60 business days following the end of the 12-month period and the Department will be electronically notified within 5 business days of publication. The compliance report has been prepared in accordance with the relevant conditions and will remain published on the Santos website for the duration of this approval.</p>

Condition	Is the project compliant with the condition?	Evidence / Comments
<p>e. Exclude or redact <b>sensitive ecological data</b> from <b>compliance reports</b> published on the <b>website</b> or otherwise provided to a member of the public.</p> <p>f. If <b>sensitive ecological data</b> is excluded or redacted from the published version, submit the full <b>compliance report</b> to the <b>department</b> within 5 <b>business days</b> of its publication on the <b>website</b> and notify the <b>department</b> in writing what exclusions and redactions have been made in the version published on the <b>website</b>.</p> <p><i>Note: Compliance reports may be published on the department's website.</i></p>		
<i>Reporting Non-compliance</i>		
<p>42. The approval holder must notify the <b>department</b> electronically, within 2 <b>business days</b> of becoming aware of any <b>incident</b> and/or potential non-compliance and/or actual non-compliance with:</p> <ul style="list-style-type: none"> <li>a. the conditions.</li> <li>b. commitments made in a <b>plan</b> which results and/or is likely to result in an increased impact to <b>protected matters</b>.</li> </ul>	Not applicable	There have been no incidents and/or potential non-compliance and/or actual non-compliance during the reporting period.
<p>43. The approval holder must specify in the notification required by condition 42:</p> <ul style="list-style-type: none"> <li>a. Any condition which has been or may have been breached and any commitment made in a <b>plan</b> for which condition 42.b. applies.</li> <li>b. A short description of the <b>incident</b> and/or potential non-compliance and/or actual non-compliance.</li> <li>c. The location (including co-ordinates), date, and time of the <b>incident</b> and/or potential non-compliance and/or actual non-compliance.</li> </ul>	Not applicable	There have been no incidents and/or potential non-compliance and/or actual non-compliance during the reporting period.

Condition	Is the project compliant with the condition?	Evidence / Comments
<i>Note: If the exact information cannot be provided, the approval holder must provide the best information available.</i>		
<p>44. The approval holder must provide to the <b>department</b> in writing, within 12 <b>business days</b> of becoming aware of any <b>incident</b> and/or potential non-compliance and/or actual non-compliance, as specified in condition 43, the details of that <b>incident</b> and/or potential non-compliance and/or actual non-compliance. The approval holder must specify:</p> <ul style="list-style-type: none"> <li>a. Any corrective action or investigation which the approval holder has already taken.</li> <li>b. The potential impacts of the <b>incident</b> and/or non-compliance and/or non-compliance.</li> <li>c. The method and timing of any corrective action that will be undertaken by the approval holder.</li> </ul>	Not applicable	There have been no incidents and/or potential non-compliance and/or actual non-compliance during the reporting period.
<i>Independent Audit</i>		
45. The approval holder must ensure that <b>independent audits</b> of compliance with the conditions are conducted as requested in writing by the <b>Minister</b> .	Not applicable	An independent audit of compliance with the conditions has not been requested in writing by the Minister during the reporting period.
<p>46. For each <b>independent audit</b>, the approval holder must:</p> <ul style="list-style-type: none"> <li>a. Provide the name and qualifications of the nominated <b>independent</b> auditor and the draft audit criteria to the <b>department</b>.</li> <li>b. Only commence the <b>independent audit</b> once the audit criteria have been approved in writing by the <b>department</b>.</li> <li>c. Submit the <b>audit report</b> to the <b>department</b> for approval within the timeframe specified in the approved audit criteria.</li> </ul>	Not applicable	An independent audit of compliance with the conditions has not been requested in writing by the Minister.
47. The approval holder must publish the <b>audit report</b> on the <b>website</b> within 10 <b>business days</b> of receiving the <b>department's</b> approval of the <b>audit report</b> and keep the audit report published on the <b>website</b> until the end date of this approval.	Not applicable	An independent audit of compliance with the conditions has not been requested in writing by the Minister during the reporting period.
<i>Completion of the Action</i>		

Condition	Is the project compliant with the condition?	Evidence / Comments
48. The approval holder must notify the <b>department</b> electronically 60 <b>business days</b> prior to the expiry date of this approval, that the approval is due to expire.	Not applicable	Santos will electronically notify the department that the approval is due to expire 60 business days prior to the expiry date of this approval.
49. Within 20 <b>business days</b> after the <b>completion of the Action</b> , and, in any event, before this approval expires, the approval holder must notify the <b>department</b> electronically of the date of <b>completion of the Action</b> and provide <b>completion data</b> .	Not applicable	Santos will electronically notify the department of the date of completion of the Action and provide completion data within 20 business days of completion of the Action.