

EPBC Act Annual Return

Santos GLNG Gasfields No 2008/4059

Document Number: 0007-650-EMP-0010

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1.0 Introduction

On 22 October 2010, Santos Ltd (Santos) received approval to develop, construct, operate and decommission coal seam gas resources in the Surat and Bowen Basins between Roma and Emerald in Queensland to supply gas for a related proposal for a natural gas liquefaction and export facility near Gladstone as described in referral EPBC No 2008/4059 (EPBC Approval).

The 2020 Annual Environmental Return (2020 AER) has been developed to satisfy Condition 110 and Condition 111 of the EPBC Approval.

Condition 110 states:

“110. The proponent must produce an Annual Environmental Return which:

- a) addresses compliance with these conditions;
- b) records any unavoidable adverse impacts on MNES, mitigation measures applied to avoid adverse impacts on MNES; and any rehabilitation work undertaken in connection with any unavoidable adverse impact on MNES;
- c) identifies all non-compliances with these conditions; and
- d) identifies any amendments needed to plans to achieve compliance with these conditions.”

Condition 111 States:

“111. The proponent must publish the Annual Environmental Return on the Internet within 20 business days of each anniversary date of this approval.”

The anniversary date of the EPBC Approval is 22 October. This AER covers the period 22 October 2019 – 21 October 2020 (AER period).

2.0 Compliance

2.1 Compliance with conditions – Condition 110(a)

Table 2-1 Compliance with Conditions of EPBC Act Approval No. 2008/4059 provides an update on how Santos is addressing each of the conditions imposed by the EPBC Approval.

2.2 Matters of National Environmental Significance – Condition 110(b)

2.2.1 Unavoidable Adverse Impacts on MNES

Unavoidable impacts from gas field development on Commonwealth listed threatened ecological communities and habitat for EPBC Act listed fauna species that are subject to the EPBC Approval have been quantified and are in accordance with limits as set in condition 25.

2.2.2 Mitigation Measures Applied to Avoid Adverse Impacts on MNES

Implementation of the following management plans provide for mitigation and avoidance of adverse impacts on MNES:

- Environmental Protocol for Constraints Planning and Field Development (the Protocol);
- Significant Species Management Plan; and
- Remediation, Rehabilitation and Recovery Monitoring Plan.

2.2.3 Rehabilitation Work Undertaken in Connection with any Unavoidable Adverse Impacts on MNES

To date no rehabilitation works have been completed in connection with the unavoidable adverse impacts on MNES. Reinstatement of disturbed areas has occurred including erosion and sediment control measures and site stabilisation in line with the approved RRRMP. Rehabilitation works will commence as soon as reasonably practicable following the completion of decommissioning activities.

2.3 Non-compliances – Condition 110(c)

Condition 106 states:

“106. The proponent must, when first becoming aware of a non-compliance with these conditions, or a plan required to be approved by the Minister under these conditions:

- a) report the non-compliance and remedial action to the Department within five business days; and*
- b) bring the matter into compliance within a reasonable time frame specified in writing by the Department.”*

There were no incidents involving impacts to MNES during the reporting period.

2.4 Amendments to plans – Condition 110(d)

“110. The proponent must produce an Annual Environmental Return which:

- d) identifies any amendments needed to plans to achieve compliance with these conditions.”*

There were no amendments to plans during the reporting period.

Table 2-1 Compliance with Conditions of EPBC Act Approval No. 2008/4059

Condition	Evidence / Comments
Project area	
<p>1. The project area is the area designated as Figure 1, the Santos GLNG Reasonably Foreseeable Development Area (RFDA).</p>	<p>The project area is compliant with the area as illustrated Figure 1.</p> <p>On 26 November 2017 this condition was amended to remove the direct reference to tenements. Now the project area is defined by reference to Figure 1 only.</p>
Infrastructure limits	
<p>2. Impacts must be limited to a maximum of 2,650 production wells and impacts related to associated gas field development.</p>	<p>Potential impacts are limited to a maximum of 2650 production wells and associated gas field development.</p>
Constraints Planning and Field Development	
<i>Protocol for Constraints Planning and Field Development</i>	
<p>3. Before the commencement of gas field development, the proponent must develop a Constraints Planning and Field Development Protocol (the Protocol).</p>	<p>Santos GLNG has developed a Constraints Planning and Field Development Protocol (the Protocol) in accordance with conditions 3, 4, 5 and 6.</p>
<p>4. The Protocol must include and apply for the life of the project and include the principles of:</p> <ul style="list-style-type: none"> a) avoiding direct and indirect adverse impacts on MNES; b) mitigating and managing direct and indirect impacts to minimise cumulative adverse impacts on MNES; c) active site remediation and rehabilitation of impacted areas to promote and maintain long-term recovery of MNES. 	
<p>5. The Protocol must:</p> <ul style="list-style-type: none"> a) Classify the following as being within the proponent's high environmental constraint class B (or should the proponent's classification be revised, an equivalent high environmental constraints class): <ul style="list-style-type: none"> i) all listed threatened ecological communities; ii) all listed flora species; and iii) those listed threatened and migratory fauna species habitats as identified in management plans required under these conditions, which where relevant may be described in terms of specific niche habitat types; <p>Note: The proponent's approach to environmental constraint class B and related avoidance and impact mitigation is described in SEIS Attachment D5 (dated November 2009). The protocol conditions do not apply to the other constraints that the proponent has included in environmental constraint class B unless these are relevant to MNES.</p> b) take into account all current survey data and available information and maps of all MNES relevant to the project area as described within environmental constraint class B; c) require the undertaking and documentation of planning and pre-clearance site assessments and field ecological surveys in proposed gas field development areas where constraint class B is mapped, likely or found. The pre-clearance site assessments and field ecological surveys must identify and assess options relating to potential gas field development adverse impacts on MNES and provide recommendations to inform the proponent's decision to develop the project area; d) to avoid direct and indirect adverse impacts on MNES, including fragmentation and edge effects, require the proponent to determine the location of proposed infrastructure in accordance with the following: <ul style="list-style-type: none"> i) preferentially avoid native vegetation that constitutes a listed ecological community and/or may provide habitat for listed species and utilise previously cleared or previously utilised areas; ii) exclude exploration and production wells from within areas identified as environmental constraint class B unless their location in environmental constraints class B is justified as an exception given other constraints and the impact on any MNES will be minimal, short term, and recoverable; and <p>Note: Directional drilling and multiple drill holes from one well pad are options to avoid well site and related infrastructure disturbance to environmental constraint class B.</p> iii) either: <ul style="list-style-type: none"> (1) exclude other non linear infrastructure from the no impact zone; or 	

Condition	Evidence / Comments																						
<p>(2) where the location of other non linear infrastructure in the no impact zone cannot be avoided, only authorise the siting of that infrastructure in that zone where field ecological surveys demonstrate that there will be minimal, short term, and recoverable, or no adverse impact on any MNES, including habitat for any listed species; and</p> <p>iv) either:</p> <p>(1) exclude linear infrastructure from the impact risk zone; or</p> <p>(2) where the location of linear infrastructure in the impact risk zone is justified given other constraints and cannot be avoided, only authorise the siting of that infrastructure in that zone where field ecological surveys demonstrate that there will be minimal adverse impact on any MNES, including habitat for any listed species;</p> <p>Note: Justification is reportable in accordance with condition 13 a) vii). The management plan requirements under condition 8 h) may also indicate that a species or its habitat can co-exist with specific types of gas field infrastructure and operations.</p> <p>e) require the proponent to plan for and decide the extent that proposed linear infrastructure may have an adverse impact on MNES in accordance with the following:</p> <p>i) all linear disturbance within environmental constraint class B for MNES and the impact risk zone must be in accordance with the limits specified in Table 1 Authorised Disturbance for Linear Infrastructure</p> <p>Table 1: Authorised Disturbance for Linear Infrastructure</p> <table border="1" data-bbox="255 842 1258 1871"> <thead> <tr> <th>Type of Linear Infrastructure</th> <th>Clearing Width (m)</th> </tr> </thead> <tbody> <tr> <td colspan="2">(A) Access track(s) not associated with a pipeline(s), communication line(s) or power line(s):</td> </tr> <tr> <td>(a) single carriage access tracks</td> <td>18</td> </tr> <tr> <td>(b) dual carriage access tracks</td> <td>21</td> </tr> <tr> <td>(c) single or dual carriage access track and associated turnaround bay with a single pipeline, communication line or power line</td> <td>35</td> </tr> <tr> <td colspan="2">(B) Access track(s) associated with a pipeline(s), communication line(s) or power line(s):</td> </tr> <tr> <td>(a) single carriage access tracks with a single pipeline, communication line or power line</td> <td>24</td> </tr> <tr> <td>(b) dual carriage access tracks with a single pipeline, communication line or power line</td> <td>27</td> </tr> <tr> <td>(c) single or dual carriage access track and associated turnaround bay with a single pipeline, communication line or power line</td> <td>41</td> </tr> <tr> <td>(d) additional clearing for any additional parallel pipeline, communication line or power line associated with (B) (a), (b), or (c)</td> <td>7¹</td> </tr> <tr> <td colspan="2">(C) Additional clearing for take-off drains, powerline stays or turnaround bays or other work areas:</td> </tr> </tbody> </table>	Type of Linear Infrastructure	Clearing Width (m)	(A) Access track(s) not associated with a pipeline(s), communication line(s) or power line(s):		(a) single carriage access tracks	18	(b) dual carriage access tracks	21	(c) single or dual carriage access track and associated turnaround bay with a single pipeline, communication line or power line	35	(B) Access track(s) associated with a pipeline(s), communication line(s) or power line(s):		(a) single carriage access tracks with a single pipeline, communication line or power line	24	(b) dual carriage access tracks with a single pipeline, communication line or power line	27	(c) single or dual carriage access track and associated turnaround bay with a single pipeline, communication line or power line	41	(d) additional clearing for any additional parallel pipeline, communication line or power line associated with (B) (a), (b), or (c)	7 ¹	(C) Additional clearing for take-off drains, powerline stays or turnaround bays or other work areas:		
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<i>Management plans for listed species and ecological communities</i>							
<p data-bbox="195 1442 1926 1556">7. Before commencement of each major stage of gas field development the proponent must develop management plans for that area addressing each listed species and listed ecological community that, as indicated through assessment or more recent information, may be potentially impacted by gas field development within the project area (defined by condition 1), or external to the project area as a result of gas field development.</p>	<p data-bbox="1932 1442 2742 1556">Santos has developed the CSG Fields Significant Species Management Plan (SSMP) in accordance with conditions 7, 8, 9 and 10.</p>						
<p data-bbox="195 1556 1926 1887">8. Management plans required under condition 7 must be developed by a qualified ecologist approved in writing by the Department and at least address those listed ecological communities in Table 3 and those listed species in Table 4 of these conditions. As a minimum each plan must address the following as is relevant to each MNES:</p> <ul style="list-style-type: none"> a) current legal status (under EPBC Act); b) known distribution; c) known species' populations and their relationships within the region; d) extent of ecological community fragmentation within the region and if appropriate minimum patch size for that community e) to support field identification and ecological surveys, description of the relevant characteristics of the ecological community; f) species' biology and reproduction and description of general habitat; g) to support field identification and ecological surveys, description of the species' habitat, which may be described in terms of essential habitat, and 							

Condition	Evidence / Comments
<p>microhabitat including associations with geology, soils, landscape features and associations with other native fauna and/or flora or ecological communities, and where relevant specific niche habitat descriptions that can be meaningfully applied in constraints planning and used in field ecological surveys; Note: Constraints mapping may be limited by available data for many species and may therefore be inadequate to map habitat requirements for planning and management purposes, or to indicate presence without on ground assessment. Condition 8 g) requires the essential components of a species' habitat to be described where relevant to support field identification and environmental constraints decision making. This should include essential habitat components for widely distributed species present in low numbers and for other species likely to be present but not often observed.</p> <p>h) threats to MNES relating to the development and management of land within the gas fields including from the development, operation and decommissioning of infrastructure within the gas fields; and from groundwater extraction and aquifer depressurisation, CSG water use and disposal, whether the threat is within or outside the gas field development area; Note: This part of a management plan may also indicate that a species or its habitat can co-exist with specific types of gas field operations.</p> <p>i) relevant management practices and methods to minimise impact and recover from impact that should include:</p> <ul style="list-style-type: none"> i) site rehabilitation timeframes, standards and methods; ii) use of sequential clearing to direct fauna away from an impact zone; iii) re-establishment of native vegetation in linear infrastructure corridors; iv) welfare and safe handling of fauna specimens requiring relocation from impact sites; v) handling practices for flora specimens; vi) translocation practices and monitoring for translocation success; vii) monitoring methods including for rehabilitation success and recovery; <p>j) surface and ground water quality and quantity requirements, including relevant downstream environmental quality parameters;</p> <p>k) reference relevant conservation advice, recovery plans, or other policies, practices, standards or guidelines relevant to MNES published or approved from time to time by the Department or the Minister.</p> <p>Note 1: The management plans must include sufficient detail to inform field development decisions, ongoing management and decommissioning to minimise adverse impacts on MNES through the life of the project.</p> <p>Note 2: To the extent that the requirements of condition 8 are satisfied for each species, a single plan may be prepared to address a group of species which have similar ecological characteristics and habitat needs. Other conditions also require species or ecological community management plans to be developed in certain circumstances in accordance with condition 8.</p>	
<p>9. Each species and ecological community management plan must be submitted for the approval of the Minister. Commencement of each major stage of gas field development within the project area must not occur without written approval of each plan for each listed species and ecological community within the proposed area of development. The proponent may undertake activities that are critical to commencement that are associated with mobilisation of plant and equipment, materials, machinery and personnel prior to the start of development only if such activities will have no adverse impact on MNES, and only if the proponent has notified the Department in writing before an activity is undertaken. Approved species and ecological community management plans must be implemented.</p>	
<p>10. The proponent must establish a program for routine review of the species and ecological community management plans to be undertaken by a qualified ecologist approved by the Department (with other experts as appropriate) to take into account any new information available to the proponent, including any information and advice provided by Commonwealth or Queensland Government agencies, or available from other CSG proponents.</p>	
<p>11. The Minister may require through a request in writing the periodic review of the species and ecological community management plans either by the Department; or alternatively by an independent qualified ecologist, or other experts, approved by the Department. Plans must be approved by the Department in writing.</p>	<p>No requests have been received from the Department to update the management plans during the AER period.</p>
<p>12. Independent review of plans will be at the financial expense of the proponent. Once independently reviewed, plans must be submitted for written approval by the Department. Approved plans must be implemented.</p>	<p>Not applicable during the AER period.</p>
<p><i>Record of impacts</i></p>	
<p>13. If an impact (which may include a presumed impact where the species is presumed to be present) occurs to a MNES during gas field development, operation, or decommissioning the proponent must:</p> <ul style="list-style-type: none"> a) record the impact by reference to: <ul style="list-style-type: none"> i) the location, specific site and type of infrastructure or activity; 	<p>Project impacts are in accordance with the limits prescribed in the approval. All disturbances are recorded and maintained in accordance with this condition.</p>

Condition	Evidence / Comments
ii) each MNES subject to disturbance; iii) the related site assessment or field ecological survey documentation and recommendations, or the decision that the particular MNES was presumed to be present; iv) the disturbance limit set under condition 25; v) the total area of actual disturbance; vi) the remaining disturbance limit for each affected MNES; vii) the reasons for the decision including justification for the action taken, description of the efforts taken to avoid impact, and explanation why other constraints might justify the adverse impact on MNES; viii) actions and commitments by the proponent to remediate, rehabilitate, or make good any unauthorised disturbance; and Note: This condition applies to any adverse impact on MNES, whether or not a disturbance limit has been set, and whether or not the impact has been decided by the proponent under the Protocol based on other physical constraints. b) record the information to a standard which can be independently audited.	
Site remediation, rehabilitation and recovery plan	
14. Where a direct or indirect impact has occurred to MNES (which may include a presumed impact where the species is presumed to be present) the proponent must under the Protocol apply remediation, rehabilitation and recovery measures appropriate for each MNES to restore connectivity or rehabilitate disturbed areas to pre-clearance quality or better, and to minimise cumulative impacts throughout the life of the project.	Santos has developed a CSG Fields Remediation, Rehabilitation, Recovery and Monitoring Plan (RRRMP) in accordance with conditions 14, 15, 16, 17, 18 and 19.
15. Before commencement of gas field development the proponent must develop a Remediation, Rehabilitation, Recovery and Monitoring Plan. The Plan must: a) include site remediation measures including timeframes and standards for preventing erosion and stabilising disturbed soil in impact areas; b) include measures to support recovery of listed species' habitat and recovery of listed ecological communities affected by gas field development; c) include responses to threats to MNES from the proponent's operational activities and land management activities including the disposal and use of associated water, damage by livestock, and impacts from feral animals and weeds; d) provide for fire prevention and management regimes during construction, operation, and decommissioning to protected MNES; e) include performance measures and related monitoring to assess site remediation, rehabilitation and recovery; f) provide for reporting on the implementation of the Remediation, Rehabilitation, Recovery and Monitoring Plan including monitoring and performance to a standard which can be independently audited; g) reference relevant conservation advice, recovery plans, species management plans, or policies, practices, standards or guidelines endorsed or approved from time to time by the Department. Note: The proponent may develop the plan to satisfy the requirements of both the Queensland Government and these conditions as indicated in condition 98 b).	
16. The Remediation, Rehabilitation, Recovery and Monitoring Plan must be submitted for the approval of the Minister. Commencement of gas field development must not occur without written approval of this Plan. The proponent may undertake activities that are critical to commencement that are associated with mobilisation of plant and equipment, materials, machinery and personnel prior to the start of development only if such activities will have no adverse impact on MNES, and only if the proponent has notified the Department in writing before an activity is undertaken. The approved Remediation, Rehabilitation, Recovery and Monitoring Plan must be implemented.	
17. The proponent must establish a program to routinely review the Remediation, Rehabilitation, Recovery and Monitoring Plan by an independent qualified ecologist, or other experts, approved by the Department to take into account any new information available to the proponent, including any information and advice provided by Commonwealth or Queensland Government agencies, or available from other CSG proponents.	
18. The Minister may require through a request in writing the periodic review of the Remediation, Rehabilitation, Recovery and Monitoring Plan by the Department; or alternatively by independent qualified ecologist, or other experts, approved by the Department. Plans must be approved by the Department in writing.	No requests have been received from the Department to update the management plans during the AER period.
19. Independent review of plans will be at the financial expense of the proponent. Once independently reviewed, plans must be submitted for written approval by the Department. Approved plans must be implemented.	Independent reviews were not required during the AER period.
<i>Approval and Review of Protocol</i>	

Condition	Evidence / Comments		
<p>20. The Protocol must be submitted for the approval of the Minister. Commencement of gas field development must not occur without written approval of the Protocol. The proponent may undertake activities that are critical to commencement that are associated with mobilisation of plant and equipment, materials, machinery and personnel prior to the start of development only if such activities will have no adverse impact on MNES, and only if the proponent has notified the Department in writing before an activity is undertaken. The approved Protocol must be implemented.</p> <p>Note: The review required following completion of the Cumulative Impact Assessment Report required by the Queensland Government may be done after approval of the Protocol. The Department may seek review of the Protocol to align with Queensland Government requirements to support efficiency and avoid duplication.</p>	<p>The Protocol was first approved by the Department on 21 September 2011.</p>		
<p>21. The proponent's review of the Protocol must take into account all relevant studies, policies, standards, guidelines and advice relating to CSG activity published or provided to the proponent by the Commonwealth or Queensland governments, or published or provided by other proponents undertaking similar activities, or published or provided by other parties, including any findings of an audit against conditions, or plans or other documentation required under the conditions of this approval.</p>	<p>Revision E of the Constraints Planning Protocol is the existing approved version. No revision of this Plan was undertaken during the period of the 2019 AER.</p>		
<p>22. The Protocol and related plans must be reviewed and updated by the proponent: to take into account the findings of the Cumulative Impact Assessment Report required by the Queensland Government; before each major stage of the proponent's gas field development; or following a written request from the Department; or following a written request from the Department. Reviewed and updated Protocols and plans must be submitted for the Minister's written approval. Once approved, updated Protocols and plans must be implemented.</p>	<p>During the reporting period, the protocol or related plans were not updated.</p>		
<p>23. The Department may require through a request that the Protocol and related plans be revised or amended before approval. Any such request must be acted on within the time frame specified.</p>	<p>No requests have been made during the reporting period</p>		
<p>24. The approved Protocol must be incorporated into the proponent's management procedures, operational plans and other relevant documentation and kept current for the life of the project.</p>	<p>The Protocol is referenced in the SSMP, RRRMP, Operational Plans and other management plans where relevant.</p>		
<i>Disturbance limits</i>			
<p>25. The following maximum disturbance limits in Table 3 and Table 4 and Table 5 below apply to authorised unavoidable adverse impacts on MNES as a result of exploration, development, operation and decommissioning of the CSG fields within the project area illustrated in Figure 1, and external to it, ('whole of project' disturbance limits) as a result of all associated gas field activities for the life of the project.</p>	<p>Disturbance limits have been incorporated into the Protocol and tracked in Santos data management systems.</p>		
Table 3: Disturbance limits for listed threatened ecological communities			
Ecological Community	EPBC Act Status	Project Phase 1 Disturbance Limit (ha)	Disturbance Limit (ha)
Brigalow (Acacia harpophylla dominant and co-dominant)	Endangered	19.6	74 ha
Semi-evergreen vine thickets of the Brigalow Belt (North and South) and Nandewar Bioregions	Endangered	1.8	99 ha
Natural Grasslands of the Queensland Central Highlands and the northern Fitzroy Basin	Endangered	5.2	47 ha
The community of native species dependent on natural discharge of groundwater from the Great Artesian Basin	Endangered	0	0 (No disturbance authorised)
<p>Note: Table 3 is derived from the Queensland Santos Coordinator-General Report, Appendix 2, Condition 16 – Gas field Disturbance Limit; and Santos EIS and listed in Table 3.3 – 4 of the Ecofund Offset Package Report 28 May 2010)</p>			
<p>Table 4: Disturbance limits for listed species</p>			

Condition				Evidence / Comments
Species	EPBC Act Status	Project Phase 1 Disturbance Limit (ha)	Maximum Disturbance Limits (ha of habitat type)	
<i>Dasyurus hallucatus</i> (Northern Quoll)	Endangered	109.3	1470	
<i>Chalinolobus dwyeri</i> (Large-eared Pied Bat, Large Pied Bat)	Vulnerable	116.4	701	
<i>Turnix melanogaster</i> (Black-breasted Button-quail)	Vulnerable	3.2	109	
<i>Erythrotriorchis radiatus</i> (red Goshawk)	Vulnerable	139.4	1010	
<i>Rostratula australis</i> (Australian Painted Snipe)	Vulnerable	11.2	24	
<i>Paradelma orientalis</i> (Brigalow Scaly-Foot)	Vulnerable	Not Applicable (Delisted)	Not Applicable (Delisted)	
<i>Delma Torquata</i> (Collared Delma)	Vulnerable	153.93	2040	
<i>Geophaps scripta scripta</i> (Squatter Pigeon (Southern))	Vulnerable	199.2	1550	
<i>Denisonia maculata</i> (Ornamental Snake)	Vulnerable	44.0	98	
<i>Egernia rugosa</i> (Yakka Skink)	Vulnerable	206.77	1447	
<i>Furina dunmalli</i> (Dunmall's Snake)	Vulnerable	205.3	1898	
<i>Nyctophilus timoriensis</i> (Eastern Long-eared Bat)	Vulnerable	275.4	1800	
Offsets				
<i>Plan to secure offsets</i>				
<p>26. Within 6 months of the commencement of the action the proponent must prepare an Offset Plan to provide an offset area for the approved disturbance limits relating to MNES within the project area. The offset area must either satisfy the requirements of the Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy October 2012 in respect of the disturbance limits identified in condition 25 or secure an area of private land which includes at least:</p> <p>a) 14.4 ha of Semi-evergreen vine thickets of the Brigalow Belt (North and South) and Nandewar Bioregions;</p> <p>b) 41.6 ha of Natural Grasslands of the Queensland Central Highlands and the northern Fitzroy Basin;</p> <p>c) 874.4 ha of potential <i>Dasyurus hallucatus</i> (Northern Quoll) habitat which includes micro habitat required for the species;</p>				<p>Santos has developed the CSG Fields Environmental Offsets Plan. The plan was submitted to the Department on 22 April 2011. The Department provided comments on the CSG Fields Offset Plan on 11 April 2012. Since 2012, a number of offset proposals have been considered and relevant correspondence has been shared with the department. An updated offset plan was submitted on 3 November 2015.</p>

Condition	Evidence / Comments
<p>d) 931.2 ha of <i>Chalinolobus dwyeri</i> (Large-eared Pied Bat, Large Pied Bat) habitat which includes micro habitat required for the species;</p> <p>e) 25.6 ha of <i>Turnix melanogaster</i> (Black-breasted Button-quail) habitat which includes micro habitat required for the species;</p> <p>f) 1115.2 ha of <i>Erythrotriorchis radiatus</i> (Red Goshawk) habitat which includes micro habitat required for the species;</p> <p>g) 89.6 ha of <i>Rostratula australis</i> (Australian Painted Snipe) habitat which includes micro habitat required for the species;</p> <p>h (deleted);</p> <p>i) 153.93 ha of <i>Delma torquata</i> (Collared Delma) habitat which includes micro habitat required for the species;</p> <p>j) 1593.6 ha of <i>Geophaps scripta scripta</i> (Squatter Pigeon (Southern)) habitat which includes micro habitat required for the species;</p> <p>k) 44 ha of <i>Denisonia maculata</i> (Ornamental Snake) habitat which includes micro habitat required for the species;</p> <p>l) 206.77 ha of <i>Egernia rugosa</i> (Yakka Skink) habitat which includes micro habitat required for the species;</p> <p>m) 205.3 ha of <i>Furina dunmalli</i> (Dunmall's Snake) habitat which includes micro habitat required for the species;</p> <p>n) 2203.2 ha of <i>Nyctophilus timoriensis</i> (Eastern Long-eared Bat) habitat which includes micro habitat required for the species;</p> <p>o) 196 ha of Brigalow with representation of the following; i) 30% remnant Brigalow (<i>Acacia harpophylla</i> dominant and co-dominant); and ii) 70% which is a combination of: (1) high value regrowth Brigalow; and (2) other Brigalow regrowth with potential for management to remnant Brigalow status. Note: Offsetting requirements for some species' habitat may be accommodated within the Brigalow components if this habitat is verified as present and includes specific habitat requirements for each relevant species.</p>	<p>A new offset management plan was lodged with the department on 30 August 2020. This plan is currently being revised in consultation with the department. This new Offset Plan proposed a method to acquit all of the offset obligations provided under Condition 26.</p>
27. Condition Removed	
28. The Offset Plan must be updated for each Project Phase and submitted for the approval of the Minister within 6 months of the commencement of the related project phase. The most recent offset plan Offset Plan must be implemented.	The Offset Plan was submitted on 30 August 2020 for approval. This plan is currently being revised in consultation with the department.
29. Condition Removed	
30. Condition Removed	
31. The Proponent must deliver environmental offsets that satisfy the requirements of the EPBC Act Offsets Policy for residual significant impacts to MNES for each Project Phase subsequent to Project Phase 1. The Proponent must secure the offset for each Project Phase within 2 years of commencement of that Project Phase.	On 19 March 2014, Santos advised the Department that the proposed offset area required to meet Condition 26 had been secured.
<i>Offset Area Management</i>	
<p>32. Prior to commencement of each Project Phase, the Proponent must develop an Offset Area Management Plan which must specify measures to improve the environmental values of the offset area in relation to MNES, including;</p> <p>a) the documentation and mapping of current environmental values relevant to MNES of the area including details of the offset attributes (including maps in electronic Geographic Information System (GIS) format with accompanying raster and shapefiles of each offset area boundary);</p> <p>b) measures to address threats to MNES including but not limited to grazing pressure and damage by livestock and adverse impacts from feral animals and weeds;</p> <p>c) measures to provide fire prevention and management regimes appropriate for the MNES;</p> <p>d) management of revegetation areas to the stage where habitat is established or improved for listed species and revegetation areas meet the criteria for 'remnant status' for that threatened ecological community;</p> <p>e) measures to ensure as an objective, that as revegetation areas meet the criteria applicable at the time for 'remnant status' application is made to have the revegetation areas reclassified as 'remnant vegetation' in accordance with the relevant Queensland legislation;</p> <p>f) monitoring, including the undertaking of ecological surveys, to assess the success of the management measures against identified milestones and objectives;</p> <p>g) performance measures and reporting requirements against identified objectives, including trigger levels for corrective actions and the actions to be taken to ensure performance measures and objectives are met.</p> <p>h) for offsets being provided under the EPBC Act Offsets Policy, a completed offsets assessment guide for the proposed offset site and explanation as to how all figures used to complete the offsets assessment guide were derived.</p>	<p>On 19 March 2014, Santos advised that the offset area had been secured and that an Offset Area Management Plan (OAMP) was being developed. On 3 November 2015, Santos GLNG submitted a new Offset Plan.</p> <p>The 2020 Offset Plan addresses the requirements of Condition 32 a) – g) for the offset site. This plan is currently being revised in consultation with the department.</p>

Condition	Evidence / Comments
<p>33. Within 12 months of securing the offset area for a Project Phase, the Offset Area Management Plan revised for that Project Phase must be submitted for the approval of the Minister. The approved Offset Area Management Plan must be implemented</p>	<p>On 30 August 2020, Santos GLNG submitted an Offset Plan. This plan incorporates the Offset Area Management Plan required by Condition 33. This plan is currently being revised in consultation with the department.</p>
<i>Rehabilitation Area Offset</i>	
<p>34. Within 2 years of the commencement of gas field development the proponent must secure a Rehabilitation Area Offset of at least 1550 hectares of privately held property to compensate for indirect adverse impacts on MNES. The proponent must:</p> <p>a) obtain ownership or a legally binding agreement from a landowner over an area of property to re-establish areas in perpetuity of the threatened Brigalow (Acacia harpophylla dominant and co-dominant) ecological community, Semi-evergreen vine thickets of the Brigalow Belt (North and South) and Nandewar Bioregions, Natural Grasslands of the Queensland Central Highlands and the northern Fitzroy Basin and associated listed migratory and listed threatened species' habitat; and</p> <p>b) notify the Department in writing within 30 business days of securing the Rehabilitation Area Offset.</p> <p>Note: The Rehabilitation Area Offset is an additional area to the Offset area required under condition 26.</p>	<p>On 19 March 2014, Santos advised that the rehabilitation offset area required under Condition 34 had been secured. On 29 May 2015, the Department was provided with land title documents showing GLNG as the registered owner of the properties subject to the Offset Plan including the areas used for the Rehabilitation Area Offset.</p>
<p>35. The Rehabilitation Area Offset must:</p> <p>a) be within historical distributions of the ecological communities (before clearing occurred) and as close as possible to the project area;</p> <p>b) include intact elements of remnant and/or high value regrowth of the ecological communities; and</p> <p>c) include or have potential for providing habitat and micro habitat requirements for listed migratory and threatened species in condition 25, Table 4, that relate to the ecological communities).</p>	<p>The Rehabilitation Area Offset discussed in the Offset Plan is within the historical distributions of the ecological communities impacted by the GLNG Project, contains intact elements of remnant and /or high value regrowth of the ecological communities and includes habitat for the EPBC Act listed species listed under Condition 25 of the EPC Approval.</p>
<p>36. If, within 2 years of the commencement of gas field development the Rehabilitation Area Offset has not been secured, then the proponent must within 30 business days, notify the Minister and provide for the Minister's approval an alternative offset measure. The alternative must provide at least an equivalent environmental outcome to those specified in relation to the Rehabilitation Area Offset. The approved alternative must be secured and implemented in accordance with conditions 34 and 35.</p>	<p>Not applicable during the 2019 AER period. However, the Department was provided with land title Documents showing GLNG as the Registered Owner of the properties subject to the rehabilitation offset.</p>
<i>Rehabilitation Area Plan</i>	
<p>37. Within 2 years of commencement of gas field development, the proponent must prepare a Rehabilitation Area Plan for the offset required under condition 34.</p>	<p>The Offset Plan provides the rehabilitation offset area required under Condition 26.</p>
<p>38. The Rehabilitation Area Plan must provide for commitments and actions to lead to the increase in the spatial extent and improvement in the condition of existing remnants, and for the establishment of new self sustaining functional 'remnant vegetation' communities, consistent with that which existed prior to clearing and with the capacity to provide habitat for the species identified in condition 25, as unavoidably impacted by the action.</p>	<p>Commitments and actions that lead to the increase in the spatial extent and improvement in the condition of existing remnants, and for the establishment of new self-sustaining functional 'remnant vegetation' communities are provided in the property scale offset area management plans.</p>
<p>39. The Rehabilitation Area Plan must include:</p> <p>a) details of the area to be rehabilitated including location and maps;</p> <p>b) documentation including mapping of current environmental values relevant to MNES of the area;</p> <p>c) where revegetation through planting seedlings and/or seeds is intended details of appropriate species and ratios of species relevant to historically occurring listed migratory and threatened species' habitat and the Brigalow (Acacia harpophylla dominant and co-dominant) ecological community; Semi-evergreen vine thickets of the Brigalow Belt (North and South) and Nandewar Bioregions; Natural Grasslands of the Queensland Central Highlands and the northern Fitzroy Basin;</p> <p>d) the source and provenance of the seed and/or seedlings which will be used;</p> <p>e) measures to address threats to MNES including but not limited to grazing pressure and damage by livestock and adverse impacts from feral animals and weeds;</p> <p>f) measures to provide fire management regimes appropriate for the MNES;</p> <p>g) measures to manage the Natural Grasslands of the Queensland Central Highlands and the northern Fitzroy Basin in accordance with the recommendations of the approved conservation advice for the ecological community;</p> <p>h) monitoring measures including ecological surveys to measure the establishment and ongoing success of the revegetation based on a comparison with high quality habitat for listed migratory and listed threatened species, and ecological community reference sites;</p>	<p>The Offset Plan includes all the relevant items required for the Rehabilitation Area Offset mentioned in Condition 39. This plan was submitted for approval on 30 August 2020. This plan is currently being revised in consultation with the department.</p>

Condition	Evidence / Comments
i) performance measures and reporting requirements against identified objectives, including trigger levels for corrective actions and the actions to be taken to ensure performance measures and objectives are met.	
40. Within 2 years of the commencement of gas field development the Rehabilitation Area Plan must be submitted for the approval of the Minister. The approved Rehabilitation Area Plan must be implemented.	The Offset Plan was submitted for the approval of the Minister. This plan and associated appendices are provided to satisfy all of the CSG Field (EPBC Approval 4059) offset requirements including the requirements of a Rehabilitation Area Plan.
41. To ensure the long term protection of the Rehabilitation Area the proponent must: a) manage Brigalow and Semi-evergreen Vine Thickets of the Brigalow Belt (North and South) and Nandewar Bioregions components of the Rehabilitation Area to a stage where they meet the respective criteria for 'remnant status' for the Brigalow (<i>Acacia harpophylla</i> dominant and co-dominant) ecological community and 'remnant status' for the Semi-evergreen Vine Thickets of the Brigalow Belt (North and South) and Nandewar Bioregions; b) When areas of revegetation meet criteria applicable at the time for 'remnant vegetation' ensure application is made to have the revegetation areas remapped and reclassified as 'remnant vegetation' in accordance with the relevant Queensland legislation. The management measures must continue to be implemented in areas not meeting the criteria for 'remnant status' until this has been achieved (or until approval to cease the management regime is provided by the Minister in writing); c) manage the Natural Grasslands of the Queensland Central Highlands and the northern Fitzroy Basin as required by condition 39 for the life of the project; d) define corrective actions which will be undertaken if performance measures and reporting indicate that successful rehabilitation has not been achieved; e) identify persons responsible and arrangements for implementing the Rehabilitation Area Plan and for reporting on performance; and f) notify the Department in writing of the reclassification of those areas of Brigalow within the Rehabilitation Area as 'remnant vegetation' within 30 business days of the reclassification occurring.	The Offset Plan and associated appendices are provided to satisfy all of the CSG Field (EPBC Approval 4059) offset requirements including the requirements of a Rehabilitation Area Plan.
42. If the proponent proposes any action within a proposed offset area, other than actions related to managing that area as an offset property, approval must be obtained, in writing from the Department. In seeking Departmental approval the proponent must provide a detailed assessment of the proposed action including a map identifying where the action is proposed to take place and an assessment of all associated adverse impacts on MNES. If the Department agrees to the action within the proposed offset site, the area identified for the action must be excised from the proposed offset and alternative offsets secured of equal or greater environmental value in relation to the impacted MNES.	Currently there are no actions proposed within any Rehabilitation Area Offset subject to the Offset Plan.
CSG Water Management	
43. The proponent must: a) take all reasonable measures to ensure that CSG water, including extracted groundwater, treated or amended CSG water, and any associated waste water, brine crystals and/or solids generated as a result of treating or amending water have no significant impact on any MNES during or beyond the life of the project; and b) if any such impacts arise apply measures identified in the Coal Seam Gas Water Monitoring and Management Plan, or other requirements under these conditions, to mitigate or make good such impacts to the satisfaction of the Minister.	Santos has prepared and submitted to the Department, both Stage 1 and Stage 2 CSG Water Monitoring and Management Plans (CWMMP). These plans include measures listed in condition 43. No impacts to MNES occurred as a result of CSG Water during the AER period.
<i>Coal Seam Gas Water Monitoring and Management Plan</i>	
<i>Hydraulic connection</i>	
44. If the proponent demonstrates to the satisfaction of the Minister, on the advice of the expert panel, that an aquifer has negligible hydraulic connectivity to other aquifers, then groundwater drawdown limits and threshold values (for groundwater drawdown and quality) for response measures in these conditions do not apply to that aquifer.	With the approval of the Stage 2 CWMMP by the Minister for the Environment on 29 November 2013, this condition has been met.
45. To avoid doubt, monitoring and risk management requirements in the Stage 1 Coal Seam Gas Water Monitoring and Management Plan (Stage 1 CSG WMMP) and the Stage 2 Coal Seam Gas Water Monitoring and Management Plan (Stage 2 CSG WMMP) (outlined below) will continue to apply to any aquifer which the proponent has demonstrated to the satisfaction of the Minister, on the advice of the expert panel, has negligible hydraulic connectivity to other aquifers.	This condition has been met via the Stage 1 CWMMP, since superseded by Stage 2 CWMMP (Revision 2) approved by the Minister on November 2013.
46. If the Minister is satisfied, acting on advice of an expert panel, that new evidence indicates a material change in hydraulic connectivity of an aquifer to which condition 44 applies, the Minister may notify the proponent, in writing, that condition 44 does not apply to that aquifer.	Santos has received no notifications from the Minister during the AER period.

Condition	Evidence / Comments
<i>Default drawdown</i>	
<p>47. Within 20 business days from the date of the project approval, or such longer period specified by the Minister in writing, the proponent must submit to the satisfaction of the Minister, modelled groundwater drawdown contour data and contour plots for each targeted aquifer.</p>	<p>The condition has been met.</p>
<p>48. The Minister, having regard to the minimum drawdown prediction from the proponent's Environmental Impact Statement and the information supplied under condition 47, will specify to the proponent, in writing, the default groundwater drawdown limit for each aquifer that will apply until the Minister's approval of the Stage 1 CSG WMMP. The proponent must not exceed the groundwater drawdown limits specified by the Minister.</p>	<p>The condition has now been met.</p>
<i>Stage 1 CSG Water Monitoring and Management Plan</i>	
<p>49. Within 6 months from the date of the project approval, the proponent must submit for the approval of the Minister a Stage 1 Coal Seam Gas Water Monitoring and Management Plan (Stage 1 CSG WMMP) which includes at least:</p> <p>Groundwater monitoring and management</p> <ul style="list-style-type: none"> a) groundwater drawdown limits for each targeted aquifer; b) a program and schedule for aquifer connectivity studies and monitoring of relevant aquifers to determine hydraulic connectivity; c) a program and schedule for field piloting of aquifer reinjection of treated CSG water and other groundwater repressurisation techniques; d) early warning indicators where drawdown thresholds are being approached. <p>Hydraulic fracturing</p> <ul style="list-style-type: none"> e) the estimated number and the spatial distribution of boreholes where hydraulic fracturing may be necessary, an annual review of the estimate, and recording of actual use; f) details of constituent components of any hydraulic fracturing agents and any other reinjected fluid(s), and their toxicity as individual substances and as total effluent toxicity and ecotoxicity, based on methods outlined in the National Water Quality Management Strategy; <p>Surface water monitoring and management</p> <ul style="list-style-type: none"> g) an ongoing water quality and quantity surface water monitoring plan that includes at least: <ul style="list-style-type: none"> i) identification of the surface and aquatic systems to be monitored and their environmental values, water quality, and environmental characteristics, and the rationale for selection; ii) the number and locations of monitoring sites upstream and downstream of proposed discharge of CSG water (whether treated water, amended water or raw water), including test and reference sites upstream and downstream and before and after any proposed impacts; iii) the frequency of the monitoring and rationale for the frequency; iv) baseline data for each monitoring site for comparison of monitoring results over the life of the project; v) the approach to be taken to analyse the results including the methods to determine trends to indicate potential impacts; vi) threshold values that protect relevant MNES (such as reporting or control line values for additional investigation, more intensive management action, make good, and cease operations) at which management actions will be initiated to respond to escalating levels of risk and designed to protect water quality and the associated environmental values of surface and aquatic systems; vii) water treatment and amendment methods and standards; viii) water storage locations and volumes including any storage and volumes required to pilot or implement reinjection or other groundwater repressurisation techniques; ix) water use or disposal options and methods (whether for beneficial use or not) including frequency, volumes, quality and environmental values documented for each receiving environment; x) brine storage locations and volumes, and brine crystal waste management; xi) emergency water discharges, their volumes and quality; xii) references to standards and relevant policies and guidelines; <p>Response actions</p> <ul style="list-style-type: none"> h) mechanisms to avoid, minimise and manage risk of adverse impacts and response actions and timeframes that can be taken by the proponent if: <ul style="list-style-type: none"> (1) threshold values for surface water quality and water environmental values specified in the CSG WMMP are exceeded; (2) there are any unforeseen emergency discharges; and <p>Reporting</p> <ul style="list-style-type: none"> i) performance measures, annual reporting to the Department, and publication of reports on the internet. 	<p>The condition set has been met.</p>

Condition	Evidence / Comments
<p>Note: A key objective of the CSG WMMP groundwater components is to maintain or restore aquifer pressure, as affected by CSG production, to levels that avoid risk of adverse impact on MNES.</p>	
<p>50. The proponent must implement the Stage 1 CSG WMMP approved in writing by the Minister acting on advice of an expert panel. The proponent must not exceed the groundwater drawdown limits for each aquifer specified in the Stage 1 CSG WMMP. The Stage 1 CSG WMMP will apply until the commencement of the approved Stage 2 CSG WMMP.</p> <p>Note: A key objective of the CSG WMMP groundwater components is to maintain or restore aquifer pressure, as affected by CSG production, to levels to avoid risk of adverse impact on MNES.</p>	<p>Changes to the program and schedule for aquifer connectivity studies have been communicated in the Santos GLNG Coal Seam Water Monitoring and Management Annual Report. No written confirmation of accepted schedule changes has been received from the Department.</p> <p>The ongoing water quality and quantity surface water monitoring plan has not been implemented as outlined in the approved Stage 2 CWMP. Continuous in-stream surface water monitoring, sufficient to detect impacts from ongoing operations has taken place downstream of the Dawson River Release Scheme and as such there is no risk to MNES.</p>
<p>51. The proponent must implement the Stage 1 CSG WMMP approved in writing by the Minister acting on advice of an expert panel. The proponent must not exceed the groundwater drawdown limits for each aquifer specified in the Stage 1 CSG WMMP. The Stage 1 CSG WMMP will apply until the commencement of the approved Stage 2 CSG WMMP.</p>	<p>Refer Condition 50.</p> <p>The condition has been met.</p>
<p><i>Stage 2 CSG Water Monitoring and Management Plan</i></p>	
<p>52. Within 18 months from the date of the approval of the action the proponent must submit for the approval of the Minister, a Stage 2 Coal Seam Gas Water Monitoring and Management Plan (Stage 2 CSG WMMP). The proponent must allow a further 3 months for the Minister's consideration of approval of the Stage 2 CSG WMMP.</p>	<p>The Stage 2 CWMP (Revision 2) has been submitted to the Department.</p>
<p>53. In addition to the matters in the Stage 1 CSG WMMP, the Stage 2 CSG WMMP must also include:</p> <p>Groundwater monitoring and management</p> <ul style="list-style-type: none"> a) an ongoing CSG water treatment program to ensure that any water to be used for re-injection, or used for other groundwater repressurisation options, is treated at least equal to the water quality of the receiving groundwater system or environment; b) the method, data and the evidentiary standards necessary to support a conclusion that an aquifer from which CSG water is being extracted is not hydraulically connected to other aquifers; c) a groundwater quality and quantity monitoring plan to monitor the aquifers underlying the project area using a statistically and hydrogeologically valid, best practice bore monitoring network across the project area addressing at least: <ul style="list-style-type: none"> i) the aquifers to be monitored and the rationale for selection; ii) the number and locations of monitoring bores and their flow, pressure, head, and water quality characteristics; iii) the frequency of the monitoring and rationale for the frequency; iv) baseline data for each monitoring site for comparison of monitoring results over the life of the project; v) the approach to be taken to analyse the results including the methods to determine trends to indicate potential impacts; vi) groundwater drawdown threshold values and groundwater quality threshold values for each aquifer (based on regional groundwater modelling endorsed by the Minister) at which management actions (such as reporting or control line values for additional investigation, more intensive management action, make good, and cease operations) will be initiated to respond to escalating levels of risk, including increasing levels of drawdown, contamination of groundwater, or subsidence; vii) references to standards and relevant policies and guidelines; viii) mechanisms to monitor, avoid, minimise, manage, and respond to risks; and ix) performance measures, annual reporting to the Department, and publication of reports on the internet; <p>Note 1: Threshold values will be identified in the plan and during the life of the approval and related conditions may be varied by the Minister on advice from an expert panel to reflect the best available data and scientific information.</p> <p>Note 2: For clarity, the monitoring required under this condition may be undertaken jointly with others.</p> <p>Response actions</p>	<p>The condition has been met.</p>

Condition	Evidence / Comments
<p>d) an exceedence response plan that includes:</p> <p>i) mechanisms to avoid, minimise and manage risk of adverse impacts and response actions and timeframes that can be taken by the proponent if:</p> <p>(1) threshold values for surface water quality and water environmental values specified in the CSG WMMP are exceeded;</p> <p>(2) threshold values specified in the CSG WMMP for aquifer drawdown or groundwater contamination are exceeded;</p> <p>(3) subsidence or surface deformation occurs which impacts on surface or groundwater hydrology;</p> <p>(4) there are any unforeseen emergency discharges; and</p> <p>ii) a program and timetable for repressurisation using re-injection of CSG water from hydraulically connected aquifers back into appropriate permeable aquifers and for other groundwater repressurisation options to re-establish pressure levels and water qualities to the satisfaction of the Minister on the advice of an expert panel, in conjunction with appropriate measures to forecast and proactively manage any short-term impacts.</p> <p>Note: The design of these groundwater repressurisation activities must be informed by a regional-scale groundwater model and a hydrochemical model approved by the Minister.</p>	
<i>Implementation of Stage 1 and Stage 2 CSG WMMP</i>	
<p>54. The proponent must implement the approved Stage 2 CSG WMMP, no later than 31 October 2013</p>	<p>The Stage 2 CWMMP (Revision 2) was approved by the Minister for the Environment on 29 November 2013 (file reference: MS13-000959) and implemented accordingly.</p> <p>The Stage 2 CWMMP is being implemented.</p>
<p>55. Three months before commencement of each subsequent major stage of the proponent's gas field development the proponent must submit a revised Stage 2 CSG WMMP for the consideration of approval of the Minister.</p> <p>Note: The Coal Seam Gas Water Monitoring and Management Plan should be based on the proponent's planned staged development within the project area over the total life of the project consistent with approvals granted by the Queensland Government. Condition 88 requires notification of commencement of major stages of gas field development.</p>	<p>The Stage 2 CWMMP (Revision 2) stated the next stage would be post first LNG shipment (which occurred in November 2015). However, agreement was reached with the Department in 2015, that this would be delayed until the issue of the 2016 Underground Water Impact Report (UWIR) for the Surat Cumulative Management Area (CMA), so that this can be incorporated into the Plan (in accordance with Condition 58).</p> <p>The 2016 Surat UWIR took effect from 19th September 2016, and therefore a revised Stage 2 CWMP was due for submission in 2017.</p> <p>A revised CWMMP provided to the Department on 5 June 2017 clarified that the next revision of the would be submitted to the Department 3 months after management plans required by EPBC 2012/6615 are approved by the Department.</p> <p>To comply with condition 58, management plans required by EPBC 2012/6615 were revised to reflect the major update to the groundwater model which is presented in the 2016 UWIR for the Surat CMA. These revised plans, specifically a revised joint industry approach to Groundwater Monitoring and Management, have yet to be approved by the Department.</p>
<p>56. The proponent may only have, own, hold, take, or otherwise utilise sufficient CSG water as is required to undertake the approved activities within the approved project area.</p>	<p>This condition is being implemented.</p>
<p>57. The Stage 1 and Stage 2 CSG WMMP as approved by the Minister in writing, acting on advice of an expert panel, and in accordance with the timing requirements under these conditions, must be implemented.</p> <p>Note: The Queensland Coordinator-General also requires surface water and groundwater monitoring and management. The proponent may incorporate requirements into plans that meet both Queensland and Commonwealth requirements.</p>	<p>The Stage 2 CWMMP (Revision 2) was submitted to the Department on 9 October 2013.</p> <p>The Stage 2 CWMMP (Revision 2) was approved by the Minister for the Environment on 29 November 2013 (file reference: MS13-000959) and implemented accordingly (refer Condition 49 and 53).</p>

Condition	Evidence / Comments
<i>Revisions of Stage 1 and Stage 2 CSG WMMP</i>	
<p>58. Consistent with an adaptive management approach the Stage 2 CSG WMMP must be reviewed and updated for each new stage of gas field development: to take into account of major updates to the Regional Groundwater Model; and to address findings of Cumulative Impact Assessment Reports required by the Queensland Government and these conditions of this approval.</p>	<p>The next revision of the CWMP is planned to be submitted to the Department 3 months after management plans required by EPBC 2012/6615 are approved by the Department.</p> <p>Management plans required by EPBC 2012/6615 were revised to reflect the major update to the groundwater model which is presented in the 2016 UWIR for the Surat CMA. These revised plans, specifically a revised joint industry approach to Groundwater Monitoring and Management, have yet to be approved by the Department.</p>
<p>59. A reviewed and updated Stage 2 CSG WMMP must be submitted to the Minister for written approval. Commencement of each new stage of gas field development must not occur without approval. The proponent may undertake activities that are critical to commencement that are associated with mobilisation of plant and equipment, materials, machinery and personnel prior to the start of development only if such activities will have no adverse impact on MNES, and only if the proponent has notified the Department in writing before an activity is undertaken. The approved CSG WMMP must be implemented for the relevant gas field area.</p>	<p>Not applicable during the reporting period.</p>
<p>60. The Minister may, through a request in writing, require that the Stage 1 or Stage 2 CSG WMMP be revised or amended, which may include requirements for amendments to address expert advice. Any such request must be acted on within the timeframe specified. Note: The Minister may throughout the project life seek advice from experts, or an expert panel. As a consequence specific matters identified through such advice may need to be addressed in the Plan. Where such advice is sought the proponent would be provided with opportunity to submit information and respond to the specific matters identified, in order to ensure the Plan is based on the best available information. Review requirements will facilitate adaptive management, alignment with Queensland Government approval requirements, and account for potential cumulative impacts as new scientific information becomes available over the life of the project.</p>	<p>Not applicable during the reporting period.</p>
Regional groundwater model	
<p>61. To avoid or minimise direct or indirect adverse impacts on MNES, the proponent must: a) develop a regional scale, multi-layer, transient groundwater flow model of the cumulative effects of multiple CSG developments; b) develop and implement an adaptive management framework, applicable at both the project scale and regional-scale, that includes monitoring and mitigation approaches to assess and manage the impacts of CSG developments, which takes into account the groundwater model of cumulative impacts required under (a); and c) contribute data as requested over the life of the Project to inform a Basin-scale multi-layer, transient groundwater flow model of the cumulative effects of multiple CSG developments in the Surat and Bowen Basins. Note 1: In the absence of sufficient evidence to characterise and quantify potential impacts at the regional scale, this condition requires the model to be developed as an early warning system, informed by any other regional cumulative hydrological modelling, such that any hydrological changes can be identified at an early stage and appropriate, effective remedial actions implemented before irreversible environmental adverse impacts on MNES. Note 2: Condition 7 Part 2, Appendix 2 of the Queensland Coordinator-General's report of 28 May 2010, provides for the proponent to provide a regional groundwater model. Note 3: The Minister may throughout the project life seek advice from the Department or additional advice from experts, or an expert panel. As a consequence specific matters identified through the advice may need to be addressed in the Model. Where such advice is sought the proponent would be provided with the opportunity to provide information and respond to specific matters in order to ensure the Model is based on the best available information and advice.</p>	<p>This is being undertaken by the OGIA. Approval has been granted by the Department on 15 July 2011 for OGIA to undertake the Regional Groundwater Model.</p> <p>The 2016 UWIR for the Surat CMA took effect from 19th September 2016.</p>
<p>62. The model required under condition 61 (a) must:</p> <ul style="list-style-type: none"> a) use the best hydrostratigraphic and hydrogeological information available at the time, to identify the likely cumulative impacts of multiple CSG developments across the Surat and Bowen Basins; b) detail all data relating to the hydraulic connectivity between aquifers and aquitards used to substantiate the model parameterisation; c) be calibrated against measured piezometer responses in areas where CSG development has commenced; d) in relation to the reporting of model outputs – conform to the recommendations of the former Murray Darling Basin Commission Groundwater Modelling Guidelines; e) include: <ul style="list-style-type: none"> i) water balances for the major aquifers affected by the CSG operations including the expected timeframe of any changes in water balance and pressure; ii) recharge versus extraction volumes for those aquifers; 	

Condition	Evidence / Comments
iii) details of justification for and assumptions regarding aquifer seal integrity (i.e. thickness and distribution of aquitards); iv) quantification of hydraulic connectivity between different units (aquifers and aquitards) through drill stem and pump testing; and v) quantification of the impacts of reinjection and other groundwater repressurisation techniques on aquifer water balances; f) provide for adaptive monitoring, through six-monthly reporting of monitoring results and new data, and annual updates of numerical simulation models and re-interpretation of results to relevant Queensland Government and Commonwealth agencies.	
63. The model under condition 61 (a) must be provided at the same time it is provided to fulfil requirements of the Queensland Government.	
64. The proponent must seek approval of the Department if the requirement for a model required under 61 (a) is to be satisfied the proponent's contribution to a regional groundwater model developed by the Queensland Water Commission (or its successor agency), as agreed between the proponent and the Commission. Note: Where the proponent is conditioned (here or elsewhere under the approval) to address a matter that may be most efficiently managed by another party, whether another CSG proponent or a Queensland Government agency, the proponent may discharge their responsibility under the condition by contributing financially and cooperating with other parties to meet the condition i.e. to develop a single representative regional model and/or to provided a single report from one or more proponents.	
Groundwater assessment, mitigation and monitoring	
65. The proponent must provide to the Minister a copy of the groundwater assessment required under condition 8 ('groundwater impact assessment report'), Part 2, Appendix 2 of conditions imposed by the Queensland Coordinator-General in his report dated 28 May 2010. In addition, as part of a staged process of adaptive management of CSG development, the proponent must also provide the following in relation to subsidence: a) baseline and ongoing geodetic monitoring programs to quantify deformation at the land surface within the proponent's tenures. This should link from the tenement scale to the wider region across which groundwater extraction activities are occurring and any relevant regional program of monitoring; b) modelling to estimate the potential hydrological implications of the predicted surface and subsurface deformation; and c) measures for linking surface and sub-surface deformation arising from CSG activities.	The Groundwater and Surface Water Impact Study was provided as Appendix B of the Stage 1 CWMMP submitted on 21 April 2011. With the approval of the Stage 2 CWMMP by the Minister on 29 November 2013, this condition is now met.
66. When requested by the Department, the proponent must provide to the Department all geodetic monitoring data and related information from the program. This data must be provided within 30 days of request, or in a timeframe agreed to by the Department in writing.	Santos has received no requests during the 2016 AER period.
67. Any program required under condition 65 must be submitted to the Minister for approval with a proposed implementation schedule. The approved program must be implemented in a timeframe specified by the Minister.	With the approval of the Stage 2 CWMMP by the Minister for the Environment on 29 November 2013 (file reference: MS13-000959) this condition has been met.
Springs assessment, mitigation and monitoring	
68. As a precautionary approach, the proponent within 9 months of approval, or such other timeframe specified in writing by the Minister, survey for, reconfirm, and notify the Minister of the presence or absence of any springs proximal to the project area and within 100 kilometres of modelled limits of aquifer drawdown. The survey must: a) include the Lucky Last and the Scotts Creek springs in the vicinity of the Fairview gas field; and b) may with the written approval of the Minister comprise the proponent's contribution to a springs survey developed with input from the Department and undertaken by the Queensland Water Commission (or its successor agency). Note 1: This survey may include use of remote sensing and may be aligned or combined with similar survey requirements that are to be undertaken by other proponents or the Queensland Water Commission. To avoid doubt, the survey should report on both discharge and recharge springs, as EPBC Act listed species may occur in association with either. Note 2: Surveys required under this condition may be undertaken by the proponent alone or in partnership with other CSG proponents.	The required surveys have been implemented and reported to the Department. No additional springs with EPBC listed species or communities were identified. This condition has been met.
69. If presence of The community of native species dependant on natural discharge of groundwater from the Great Artesian Basin, or listed threatened species that are reliant on springs, is confirmed by a survey under condition 68, then the proponent must (unless the proponent is not able to gain access to the spring, even with the assistance of relevant government agencies): a) for springs within the project area - within 1 month of survey completion protect the ecological community and/or listed threatened species from gas field development activities by establishing and maintaining a minimum 200 m employee/contractor exclusion zone from the relevant springs within the project area, unless such access is required in an emergency, for environmental management, or for monitoring purposes; Note: The Constraints Planning and Field Development Protocol will also apply. b) Within 12 months of the survey completion provide to the Minister a management plan for all the relevant springs which includes:	No additional springs were identified during the Stage 3 ground surveys. This condition has been met.

Condition	Evidence / Comments
<p>i) a specific monitoring and remediation program to protect the ecological community and/or listed threatened species and cumulative impacts on any components within the project area and within modelled limits of aquifer draw-down that may arise from CSG water extraction, including identifying trigger levels and responses in the case of changes to groundwater flow or quality in each relevant spring;</p> <p>ii) a baseline analysis of four 3-monthly samplings to determine the seasonal presence or absence of all relevant springs, and to establish: the existence, dispersion and extent of listed threatened species; aquatic macro-invertebrates; aquatic plants; water quality characteristics; spring physical parameters including seasonal variation, depth, and flow rate; aquifer source including hydrochemical and isotopic analysis, and comparison of water levels with respect to source aquifer potentiometric surface;</p> <p>iii) ongoing monitoring on a 6 monthly basis (to cover high and low rainfall seasons) over the life of the project in the region relevant to each spring;</p> <p>iv) analysis and calibration of the monitoring results against the baseline data (collected under (ii) of this condition) as the CSG water and gas extraction occurs over the life of the project;</p> <p>v) threshold values (such as reporting or control line values for additional investigation, more intensive management actions, make good, and cease operations) at which management actions will be initiated to respond escalating levels of impact and designed to protect The community of native species dependent on the natural discharge of groundwater from the Great Artesian Basin in the case of changes to groundwater pressure, flow, or water quality in GAB springs;</p> <p>vi) specific mechanisms to avoid, minimise, and manage risks, and response actions that can be taken by the proponent where:</p> <p>(1) any threshold values for surface environmental values are exceeded;</p> <p>(2) any threshold values for aquifer draw down, water quality change, or aquifer contamination are exceeded;</p> <p>(3) subsidence or surface deformation occurs, particularly if it impacts on surface or groundwater hydrology; and</p> <p>(4) any unforeseen emergency discharges occur;</p> <p>vii) established best practice standards, policies and guidelines; and</p> <p>viii) performance measures, reporting to the Department, and publication of reports on the Internet.</p> <p>Note: Individual species and ecological community management plans are also required in accordance with condition 7 and 8. The management plans may be developed by the proponent or in partnership with other CSG proponents.</p>	
<p>70. Any management plan required under condition 69(b) must be submitted to the Minister for consideration of approval including seeking advice from an expert panel. The approved plan must be implemented within the timeframe specified by the Minister. The approved plan must be published on the Internet within 20 business days of being approved by the Minister.</p>	
<p>71. The results of the baseline analysis under 69 (b) must be incorporated into the regional groundwater model required under condition 61.</p>	
<p>Discharge, disposal or use of CSG salts, brine concentrates and heavy metals / metalloids</p>	
<p>72. Concentrated CSG salts and other brine concentrates derived from CSG water may only be disposed by either: a) injection into deeper, underlying confined aquifers of equivalent water chemistry; or, failing that, b) in secure contaminated waste disposal facilities that are licensed, operated, and monitored in accordance with the requirements of the Queensland Government. Note: This condition does not preclude the harvesting of salts and heavy metals for commercial purposes. Note: Salt disposal within the Murray-Darling Basin must be in accordance with the requirements for salinity management and accountability set out in the Water Act 2007 and the Basin Salinity Management Strategy.</p>	<p>The Stage 2 CWMMP approved by the Minister for the Environment on 29 November 2013 (file reference: MS13-000959), included further details on Santos GLNG's brine management strategy (BMS).</p> <p>There were no disposal of concentrated CSG salts or other brine concentrates during the AER period.</p> <p>In accordance with Queensland Environmental Authority conditions, Santos GLNG prepared the GLNG Brine and Salt Management Plan in October 2019.</p> <p>In accordance with the Queensland Environmental Authority conditions, the GLNG Brine and Salt Management Plan documents investigations undertaken to assess options to inform the development of a management plan for brine and salt produced from the Fairview Arcadia Project Area and the Roma Shallow Gas Project Area of the GLNG Project.</p> <p>Based on the outcomes of the assessment, the preferred brine and salt management option for GLNG is the storage of brine in solar evaporation ponds to allow time for the sun's energy to concentrate the brine, followed by crystallisation into a solid salt and final disposal in a</p>

Condition	Evidence / Comments
	salt repository. A determination of the final location for final disposal will be made at a future point in time to avoid ruling in or out options prematurely given the significant time before this decision is required to be made (i.e. 2035+).
Notification of threshold breaches and response actions	
73. Within 10 business days of the proponent identifying monitoring outcomes that indicate a risk of reduction in groundwater pressure or water quality, the proponent must notify the Minister in writing of the trend and the proponent's response action.	No monitoring outcomes have indicated a risk of reduction in groundwater pressure or water quality during the reporting period.
74. Within 10 days of a surface or groundwater threshold value (for example, water quality, environmental value, pressure, head, volume, or flow) being exceeded, the proponent must advise the Minister in writing of the circumstances, the threshold exceeded, the immediate action taken by the proponent, and proposed action to remedy the breach and avoid a subsequent breach.	No surface or groundwater threshold value has been exceeded during the reporting period.
75. Immediate action may include the ceasing of water / gas extraction and / or water discharge or use in the area affected until investigations can be completed to determine the cause and remedial action. The proponent's proposed response action must be notified to the Minister in writing.	
76. The Minister may direct in writing that the proponent cease water / gas extraction and/or water discharge or use in the area affected, and if the Minister is not satisfied that the action proposed or taken by the proponent will remedy the situation, or make good any environmental loss, the Minister may direct the proponent to implement alternative action at the expense of the proponent. Note: The proponent will be provided with a reasonable opportunity to comment on any such direction before it is required to be implemented.	No direction was received by Santos by the Department during the reporting period.
Notifications and requirements about construction, operation, brine management and environmental management plans	
77. The proponent must notify the Department in writing when developing or reviewing construction, operational, groundwater, CSG water, brine management, salinity management, environmental management, or other plans where the scope of the plans relates to potential direct, indirect or cumulative adverse impacts on MNES, or involves management of MNES. The proponent must in the notification indicate the relevant components of such plans relating to MNES and their management, and the timeframe for development and approval of the plans under Queensland Government requirements.	The QBU Environmental Monitoring Plan was updated as a result of the prescribed water conditions audit and re-submitted to the Department during this AER period. No other notifications were required for the reporting period, notwithstanding the need to revise and update the Stage 2 CWMMP in accordance with condition 58.
78. Where the scope of the plans relates to potential adverse impact on MNES, or involves management of MNES the plans must be submitted to the Minister for approval of those components. Approved components of plans must be implemented. Note: Where efficiency will be enhanced the proponent may also prepare and align management plans required under these conditions with the requirements of the Queensland Government as long as the relevant matters under the conditions of this approval are clearly and adequately addressed.	The QBU Environmental Monitoring Plan was updated as a result of the prescribed water conditions audit and re-submitted to the Department during this AER period.
Cumulative Impact Report	
79. On the same date that an assessment of cumulative impacts is provided in accordance with requirements imposed by the Queensland Government, or such other timeframe specified in writing by the Minister, the proponent must provide a copy of that report to the Minister.	The Cumulative Impacts Assessment (dated 29 July 2010) was submitted to the Department on 20 January 2011.
80. In addition to meeting any requirements imposed by the Queensland Government, the report on cumulative impacts provided to the Minister must also address the following, in relation to potential adverse impacts on MNES: a) cumulative impacts relating to all listed species and listed ecological communities within and outside project area, including The community of native species dependant on natural discharge of groundwater from the Great Artesian Basin; b) any surface water and groundwater environmental values, including groundwater pressures and groundwater hydrochemistry which, if altered, may have an impact on listed species and ecological communities within and outside project area; Note: These requirements may also be included together with the detailed assessment of cumulative impacts required under condition 2, Part 2, Appendix 2, of the Coordinator-General's reported dated 28 May 2010.	The condition has been met.

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<p>81. Within 3 years of the date that the cumulative impact report is provided to the Minister, or such other timeframe specified in writing by the Minister, the proponent must review that cumulative assessment and the report in the light of the most up-to-date information and the regional transient groundwater model required under condition 61 (a). The proponent must provide a report on the review to the Minister and at the same time publish the report on its website.</p> <p>Note: The assessment scope of the cumulative impact report is not limited to groundwater or surface water impacts. These conditions provide that, if the Minister believes that it is necessary or desirable for the better protection of a relevant controlling provision for the action, the Minister may request the proponent to make, within a period specified by the Minister, revisions to a plan approved under these conditions. The Minister may make such a request in the light of the cumulative impacts assessment, or the review of the cumulative impacts assessment. Section 136(1)(b) of the EPBC Act additionally provides that the Minister may revoke, vary or add to a condition of this approval if the action has a significant impact that was not identified in assessing the action, and if the Minister relevantly believes it is necessary.</p>	<p>A Cumulative Impact Assessment Report has been prepared as part of the Future Gas Field Development Project EIS which includes the GLNG Project (EPBC Approval 2008/4059).</p> <p>The next revision of the CWMMP is planned to be submitted to the Department 3 months after management plans required by EPBC 2012/6615 are approved by the Department, to comply with condition 58.</p>
Decommissioning Plan	
<p>82. Within five years of the commencement of gas field development, the proponent must develop a Decommissioning Plan. The Plan must:</p> <ul style="list-style-type: none"> a) require the progressive removal or reuse of infrastructure where gas field operations cease during the project life; b) establish management practices and safeguards to minimise environmental disturbance; c) ensure MNES are not impacted by progressive decommissioning, or final decommissioning of gas field infrastructure; d) define rehabilitation actions for the infrastructure sites following decommissioning including for: e) optimising habitat and habitat connectivity for MNES; f) enhancing pre-construction environmental quality; and g) ongoing management during rehabilitation. 	<p>This plan was submitted to the Department on 1 November 2017. No action required this reporting period.</p>
<p>83. The Decommissioning Plan must be submitted for the approval of the Minister. The approved Plan must be implemented.</p>	
Survey data	
<p>84. All survey data collected for the project must be collected and recorded so as to conform to data standards notified from time to time by the Department. When requested by the Department, the proponent must provide to the Department all species and ecological survey data and related survey information from ecological surveys undertaken for MNES. This survey data must be provided within 30 business days of request, or in a timeframe agreed to by the Department in writing.</p>	<p>This requirement is included in the Protocol. No requests have been made by the Department for the survey data in the reporting period.</p>
Publication of Protocol and Plans	
<p>85. The Protocol and all plans approved by the Minister under these conditions must be published on the proponent's website within 30 business days of approval by the Minister.</p>	<p>No revisions to plans or the Protocol have occurred during the reporting period.</p>
<p>86. The Department may request the proponent to publish on the Internet a plan in a specified location or format, and with specified accompanying text. The proponent must comply with any such request.</p>	<p>No such requests have been made during the reporting period.</p>
Notification of commencement	
<p>87. Within 20 business days of the commencement of the action, the proponent must advise the Department in writing of the actual date of commencement.</p>	<p>This condition has been met.</p>
<p>88. The proponent must notify the Department in writing of the proposed dates for each subsequent major stage of gas field development at least 40 business days before their commencement, and within 20 business days notify actual commencement dates, and within 20 business days of any major variations to gas field development notify the variations.</p>	<p>No action required until next subsequent major stage of development</p>
Request for variation of plans by proponent	
<p>89. If the proponent wants to act other than in accordance with a plan approved by the Minister under these conditions, the proponent must submit a revised plan for the Minister's approval.</p>	<p>Any revision to plans has been submitted for approval as required.</p>
<p>90. If the Minister approves the revised plan, then that plan must be implemented instead of the plan originally approved.</p>	
<p>91. Until the Minister has approved the revised plan, the proponent must continue to implement the original plan.</p>	

Condition	Evidence / Comments
Revisions to plans by the Minister	
92. If the Minister believes that it is necessary or desirable for the better protection of a relevant controlling provision for the action, the Minister may request the proponent to make, within a period specified by the Minister, revisions to a plan approved under these conditions. Without limiting this condition, the Minister may also make such a request following a study under s.255AA of the Water Act 2007.	The Department directed a third party audit of specific conditions of this approval. Following the audit, the Department required Santos to take into account the findings of the Audit Report in updating the consolidated QBU Environment Monitoring Plan. Santos has updated the relevant plan and re-submitted to the Department. No other specific requests have been made by the Department during the reporting period.
93. If the Minister makes a request for revision to a plan, the proponent must: a) comply with that request; and b) submit the revised plan to the Minister for approval within the period specified in the request.	
94. The proponent must implement the revised plan on approval of the Minister.	
95. Until the Minister has approved the revised plan, the proponent must continue to implement the original plan.	
Minimum timeframes for consideration of plans	
96. For any plan required to be approved by the Minister under these conditions, the proponent must ensure the Minister is provided at least 20 business days for review and consideration of the plan, unless otherwise agreed in writing between the proponent and the Minister.	The Minister has approved all relevant Santos GLNG plans.
Compliance with State environmental and other authorities	
97. The proponent must comply with all environmental authorisations issued by the State, including conditions of an environmental authority issued under the EP Act.	Condition 97 relates to legislation administered and enforced by the Queensland Government's Department of Environment and Heritage Protection. Condition 106 relating to notifications, has been amended to negate the need to notify non-compliances related to condition 97 (i.e. non-MNES related matters).
Provision of State plans	
98. If a condition of a State approval requires the proponent to provide a plan then the proponent must: a) provide the plan to the Department or Minister on request, within the period specified in the request; and b) prepare and combine plans that meet both Queensland Government requirements and the Commonwealth requirements under this approval where this is efficient. In doing so the proponent must clearly identify the respective responsibilities and how these are being addressed in relation to these conditions.	Plans have been submitted to the Department as requested. Where able, plans have been prepared to meet both State and Commonwealth requirements (e.g. the Protocol). All plans submitted contain a compliance matrix table that outlines how relevant conditions have been met
Timeframes	
99. If these conditions require the proponent to provide something by a specified time, a longer period may be specified in writing by the Minister.	No action required by Santos.
Auditing	
100. On the request of and within a period specified by the Department, the proponent must ensure that: a) an independent audit of compliance with these conditions is conducted; and b) an audit report, which addresses the audit criteria to the satisfaction of the Department, is published on the Internet and submitted to the Department.	On 4 December 2015 the Department directed Santos to undertake a scoped third party audit of Conditions 50, 52-60, 72-75, 77-78 of the EPBC Approval. A summary of the audit is located on the Department's website. The audit report has been published on the internet.
101. Before the audit begins, the following must be approved by the Department: a) the independent auditor; and b) the audit criteria.	
102. The audit report must include: a) the components of the project being audited; b) the conditions that were activated during the period covered by the audit; c) a compliance/non-compliance table; d) a description of the evidence to support audit findings of compliance or non-compliance;	

Condition	Evidence / Comments
e) recommendations on any non-compliance or other matter to improve compliance; f) a response by the proponent to the recommendations in the report (or, if the proponent does not respond within 20 business days of a request to do so by the auditor, a statement by the auditor to that effect); g) certification by the independent auditor of the findings of the audit report.	
103. The financial cost of the audit will be borne by the proponent.	
104. The proponent must: a) implement any recommendations in the audit report, as directed in writing by the Department; b) investigate any non-compliance identified in the audit report; and c) if non-compliance is identified in the audit report - take action as soon as practicable to ensure compliance with these conditions. Note: The Department will discuss findings of audit reports with the proponent to ensure compliance with conditions and before the issue of any directions.	
105. If the audit report identifies any non-compliance with the conditions, within 20 business days after the audit report is submitted to the Department the proponent must provide written advice to the Minister setting out the: a) actions taken by the proponent to ensure compliance with these conditions; and b) actions taken to prevent a recurrence of any non-compliance, or implement any other recommendation to improve compliance, identified in the audit report. Note: Independent third party auditing may include audit of the proponent's performance against the requirements of any plan required under these conditions.	
Reporting non-compliance	
106. The proponent must, when first becoming aware of a non-compliance with these conditions (except condition 97 which relates to environmental authorisations issued by the State), or a plan required to be approved by the Minister under these conditions: a) report the non-compliance and remedial action to the Department within five business days; b) bring the matter into compliance within a reasonable time frame specified in writing by the Department.	This condition has been met.
Record-keeping	
107. The proponent must: a) maintain accurate records substantiating all activities associated with or relevant to these conditions of approval, including measures taken to implement a plan approved under these conditions; and b) make those records available on request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with these conditions. Note: Audits or summaries of audits carried out under these conditions, or under section 458 of the EPBC Act, may be posted on the Department's website. The results of such audits may also be publicised through the general media.	Records are maintained and are available to the Department on request. A summary of the previously directed third party audit is located on the Department's website. On 4 December 2015 the Department directed Santos to undertake a scoped third party audit of Conditions 50, 52-60, 72-75, 77-78 of the EPBC Approval. A summary of the audit is located on the Department's website. The audit report has been published on the internet
Financial assurance	
108. The proponent must: a) provide the Minister with a financial assurance in the amount and form required from time to time by the Minister for activities to which these conditions apply; and b) review and maintain the amount of financial assurance based on proponent reporting on compliance with these conditions, and any auditing of the activities.	No requests were made during the AER period.
109. The financial assurance is to remain in force until the Minister is satisfied that no claim is likely to be made on the assurance. Note: The financial assurance may be used for rehabilitation of habitat and other purposes not addressed adequately by the proponent during the life of the project.	
Annual Environmental Return	
110. The proponent must produce an Annual Environmental Return which: a) addresses compliance with these conditions;	This document meets the requirements of conditions 110 (a) to 110 (e).

Condition	Evidence / Comments
b) records any unavoidable adverse impacts on MNES, mitigation measures applied to avoid adverse impacts on MNES; and any rehabilitation work undertaken in connection with any unavoidable adverse impact on MNES; c) identifies all non-compliances with these conditions; and d) identifies any amendments needed to plans to achieve compliance with these conditions.	
111. The proponent must publish the Annual Environmental Return on the Internet within 20 business days of each anniversary date of this approval.	The Annual Environmental Return will be published on the Santos GLNG Project website by 19 November 2019.