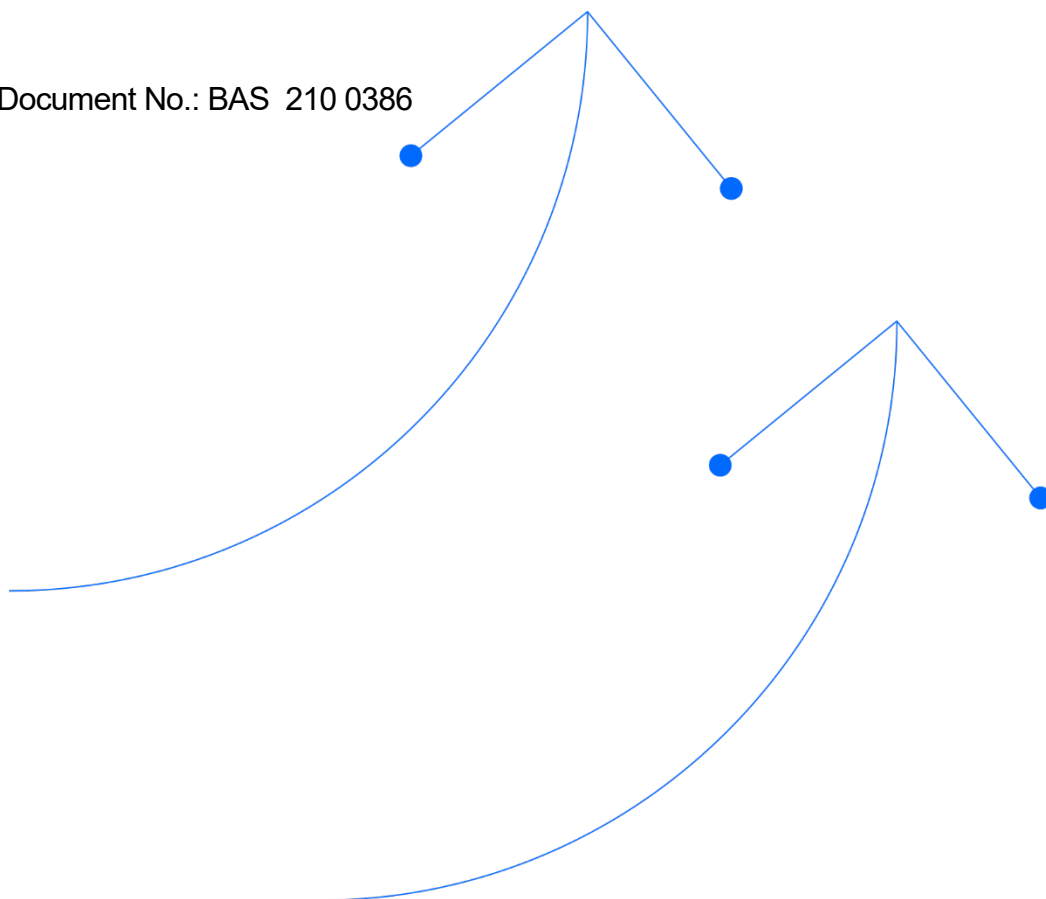


EPBC APPROVAL NO. 2022/09372 DARWIN PIPELINE DUPLICATION (DPD) PROJECT ANNUAL COMPLIANCE REPORT

11 June 2025

Document No.: BAS 210 0386



EPBC APPROVAL NO. 2022/09372 DARWIN PIPELINE DUPLICATION (DPD) PROJECT ANNUAL COMPLIANCE REPORT

Document No.: BAS 210 0386

Project / Facility	Barossa Development
Review interval (months)	No Review Required
Safety critical document	No

Rev	Owner	Reviewer(s) <i>Managerial/Technical/Site</i>	Approver
	Risk & Compliance Lead	Senior Staff Environmental Approvals Advisor	Pipeline Delivery Manager
0			

Rev	Rev Date	Author / Editor	Amendment
A	14 May 2025		Draft report issued to Santos for review
0	11 June 2025		Approved for submission

Any hard copy of this document, other than those identified above, is uncontrolled. Refer to the Santos Offshore Business Document Management System for the latest revision.

Contents

Declaration of Accuracy	3
Acronyms / Abbreviations	4
1. Introduction	5
1.1 Description of Activities	5
2. Compliance	7
2.1 Action Management Plan Implementation and Amendments	7
2.1.1 Protocol for the Protection of Underwater Cultural Heritage	7
2.1.2 Offshore Construction Environment Management Plan	8
2.1.3 Trenching and Spoil Disposal Management and Monitoring Plan	8
2.1.4 Marine Megafauna Noise Management Plan	8
2.1.5 Onshore Construction Environment Management Plan	9
2.1.6 Acid Sulfate Soil Dewatering Management Plan	9
3. New Environmental Risks	10
4. References	11
Appendix A EPBC Approval Condition Compliance Table	12
Appendix B Supporting Data	29

Tables

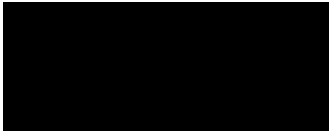
Table 1-1: Description of Activities	5
--	---

Figures

Figure 1-1: DPD Project Area	6
------------------------------------	---

Declaration of Accuracy

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

Signed:	
Full Name:	
Position:	Pipeline Delivery Manager
Organisation:	Santos
Date:	11/06/2025

Acronyms / Abbreviations

Term	Definition
ACN	Australian Company Number
ACR	Annual Compliance Report
ASSDMP	Acid Sulfate Soil Dewatering Management Plan
CCS	Carbon Capture and Storage
CEMP	Construction Environment Management Plan
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DLNG	Darwin Liquefied Natural Gas
DPD	Darwin Pipeline Duplication
EP	Environment Plan
EPBC	Environment Protection and Biodiversity Conservation
GEP	Gas Export Pipeline
MFO	Marine Fauna Observation
MMNMP	Marine Megafauna Noise Management Plan
NT	Northern Territories (Australia)
TSDMMP	Trenching and Spoil Disposal Management and Monitoring Plan

1. Introduction

On 15 March 2024, Santos NA Barossa Pty Ltd (herein Santos) received approval under section 133(1) of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) to install, pre-commission, operate and decommission a gas export pipeline and associated infrastructure, located in Commonwealth waters, NT waters and land. The 'Darwin Pipeline Duplication (DPD) Project' has extended the Barossa Gas Export Pipeline (GEP) to the Santos-operated Darwin Liquefied Natural Gas (DLNG) facility and will allow for the repurposing of the existing Bayu-Undan to Darwin pipeline to facilitate carbon capture and storage (CCS) options.

This 2025 DPD Project Annual Compliance Report (ACR) has been developed in accordance with Conditions 19, 20 and 21 of the EPBC Approval (EPBC 2022/09372) as follows:

Condition 19: The approval holder must prepare a compliance report for each 12-month period following the date of this approval decision (or as otherwise agreed to in writing by the Minister)

Condition 20: Each compliance report must be consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023

Condition 21: Each compliance report must include:

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

Throughout the reporting period, Santos was compliant with all conditions set out in EPBC Approval 2022/09372.

1.1 Description of Activities

A description of activities is summarised in **Table 1-1** and project area presented in Figure 1-1.

Table 1-1: Description of Activities

Project Name	Darwin Pipeline Duplication (DPD) Project
Approval Holder	Santos NA Barossa Pty Ltd
ACN of Approval Holder	109974932
EPBC Approval Number	2022/09372
Approved Action	To install pre-commission, operate and decommission a gas export pipeline and associated infrastructure, located in Commonwealth waters, NT waters and land
Location of Project	- NT waters offshore from Darwin Harbour (i.e., NT waters outside Darwin Harbour Region Management Area). This includes water classified and NT coastal waters regulated under the Petroleum (Submerged Lands) Act 1982 (PSL Act) and NT internal waters regulated under the Energy Pipelines Act 2018 (NT). Note, this includes the location for spoil disposal within NT internal waters; - Darwin Harbour (i.e., waters within the Darwin Harbour Management Area). These waters are classified as NT internal waters regulated under the Energy Pipelines Act 2018 (NT); and - Shore crossing and onshore location including the short onshore section of the pipeline to the upstream weld of the beach valve. This area is regulated under the Energy Pipelines Act 2018 (NT).
Person Accepting Responsibility for the Report	
Dates for the Reporting Period of the Report	15 th March 2024 – 14 th March 2025
Date of Preparation of the Report	12 June 2025

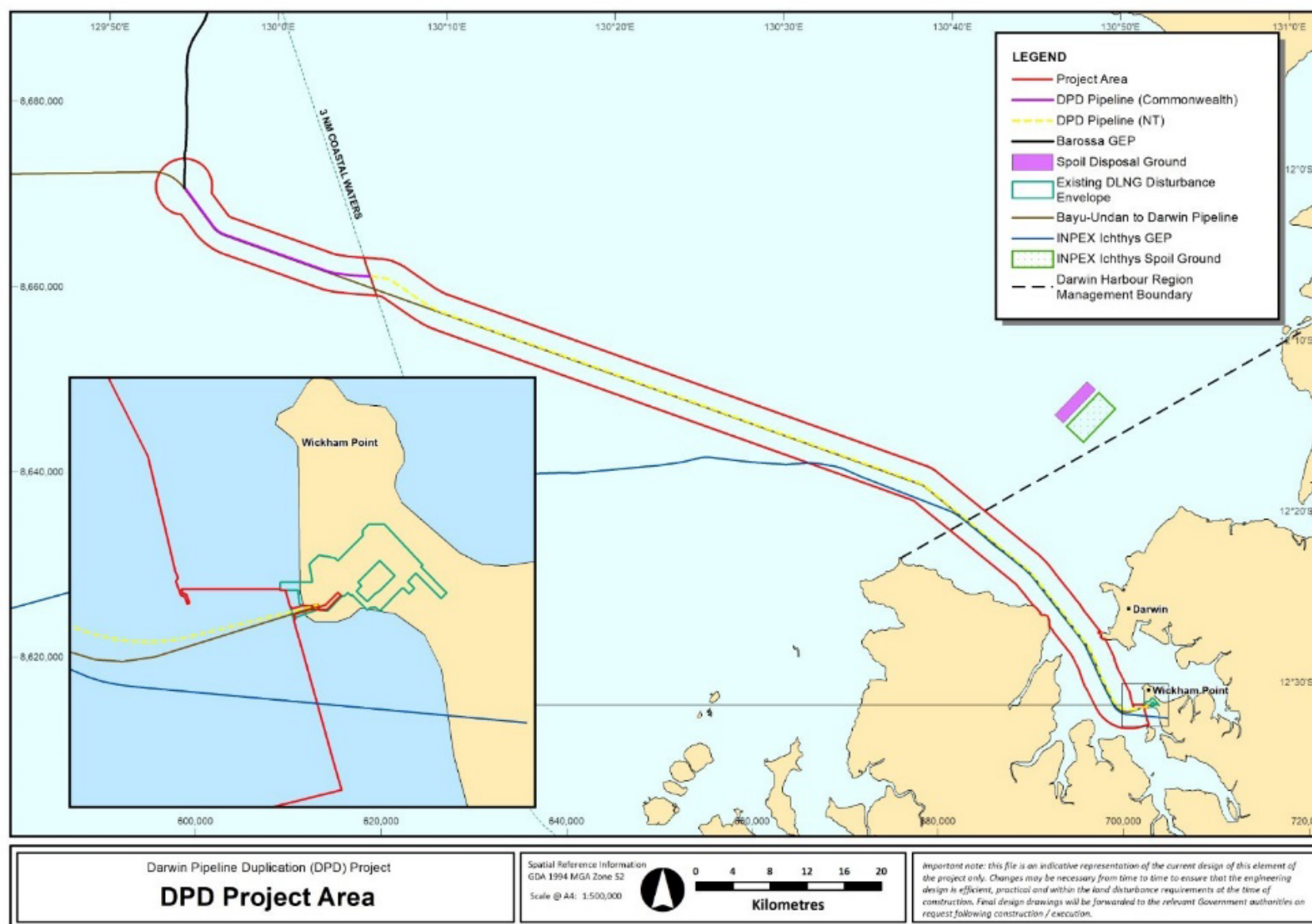


Figure 1-1: DPD Project Area

2. Compliance

The compliance assessment presented in **Appendix A** of this ACR has been performed based on the EPBC Approval (2022/09372) and is subject to conditions of Section 134(1A) of the EPBC Act.

Condition 23 – 24 of EPBC Approval (2022/09372) states:

23) The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan.

24) The approval holder must specify in the notification:

- a) Any condition or commitment made in a plan which has been or may have been breached.
- b) A short description of the incident and/or potential non-compliance and/or actual non-compliance.
- c) The location (including co-ordinates), date and time of the incident and/or potential non-compliance and/or actual non-compliance.

Santos has assessed its compliance with EPBC Approval (2022/09372) for DPD project activities by determining compliance against the Approval and any environmental performance outcomes and performance standards defined the associated Management Plans (Section 2.1). Compliance with these requirements were tracked by Santos throughout the implementation of the project and the collective records for these are maintained within the Barossa Environmental Assurance Register (BEAR) – DPD Project (BAS-210 0024) and DPD Vessel Presence and Assurance Activity Register (BAS-210 0195).

There were no non-compliances with the conditions of the EPBC Approval (2022/09372) and associated Management Plans during the reporting period.

2.1 Action Management Plan Implementation and Amendments

In accordance with the EPBC Approval (2022/09372), it is a condition to implement any associated Action Management Plans to avoid and mitigate harm on protected matters, from the commencement of the activity through until the completion of the activity.

In accordance with Condition 3 of 2022/09372, a Protocol for the Protection of Underwater Cultural Heritage (PPUCH) was submitted for approval on 3 June 2024 and accepted in writing by a delegate of the Minister for Environment and Water on 14 June 2024. The PPUCH was implemented from date of acceptance onwards.

A suite of additional Action Management Plans, as referenced in Condition 4 of 2022/09372, which collectively cover all activities from the Commonwealth/NT waters boundary to the upstream weld of the beach valve were implemented throughout the reporting period. These Action Management Plans were prepared to reduce impacts and risks from DPD Project activities to a level that is both acceptable and as low as reasonably practicable. They include a number of targets, performance indicators and management actions that were required to be met during the implementation of the DPD Project activities.

During the reporting period, three Action Management Plans (PPUCH, Offshore Construction Environment Management Plan (CEMP) and Acid Sulfate Soil Dewatering Management Plan (ASSDMP)) listed within EPBC Approval (2022/09372) were updated, submitted to Department of Climate Change, Energy, the Environment and Water (DCCEE) under Condition 7 of 2022/09372.

There were no amendments submitted for the other Action Management Plans (as detailed below) during the reporting period.

2.1.1 Protocol for the Protection of Underwater Cultural Heritage

As required under Condition 3a of 2022/09372, the PPUCH (BAS-210 0265) includes:

- Details how any underwater cultural heritage identified within the Commonwealth marine area will be avoided.
- Detailed impact control and management measures (if required) to ensure no harm to any underwater cultural heritage present within the Commonwealth marine area.

- A commitment to engage a suitably qualified underwater archaeologist to advise on any items of potential underwater cultural heritage identified during construction and any related activities impacting the sea floor (if required).
- Detailed procedures and reporting to be implemented if underwater cultural heritage is discovered, including a commitment to notify the department within 21 calendar days of identifying any underwater cultural heritage of clear archaeological character identified by a suitably qualified underwater archaeologist.
- Details of the process to be followed where any variations are required to be made to the PPUCH, including a requirement for any revised PPUCH to be submitted to the department for the Minister's approval, unless taking the action in accordance with the revised PPUCH would not be likely to have a new or increased impact.

The PPUCH, summarises findings from both maritime UCH and First Nations UCH assessments for the DPD Project Area relevant to the Commonwealth marine area. These assessments have not identified any actual or potential UCH for the DPD Project Area within the Commonwealth marine area. The PPUCH includes for an Unexpected Finds Protocol that documents the process to be followed if any previously unknown UCH are identified during the course of the DPD Project within the Commonwealth marine area.

Following acceptance on 14 June 2024, the PPUCH was revised and resubmitted to DCCEEW as Revision 1 on 20 January 2025, in accordance with Condition 7 of EPBC Approval (2022/09372), with implementation commencing 4 February 2025.

2.1.2 Offshore Construction Environment Management Plan

The Offshore CEMP (BAS-210 0024) details an overarching environmental management approach and measures for the construction of the section of the DPD pipeline from the shore pull onshore termination point to the boundary between NT and Commonwealth waters. The Offshore CEMP primarily covers activities supporting pipeline installation in marine waters, with some activities at the shoreline and onshore at the DLNG facility. Spoil disposal activities at the nominated DPD spoil disposal ground were also covered under the Offshore CEMP.

The Offshore CEMP details the environmental impacts and risks associated with the activity and demonstrates how these will be managed. The Offshore CEMP also provides an implementation strategy that was used to measure and report on environmental performance during planned activities and unplanned events, to ensure impacts and risks were continuously reduced to and maintained at an acceptable level.

The Offshore CEMP was revised and resubmitted to DCCEEW as Revision 1 on 6 December 2024, in accordance with Condition 7 of EPBC Approval (2022/09372), with implementation commencing 10 January 2025.

The Offshore CEMP was further revised and resubmitted to DCCEEW as Revision 2 on 27 March 2024, in accordance with Condition 7 of EPBC Approval (2022/09372), with implementation commencing 15 April 2025 and still ongoing at the end of the reporting period.

During the current reporting period, there were no non-compliances identified relating to the Offshore CEMP (refer to Appendix A for further information).

2.1.3 Trenching and Spoil Disposal Management and Monitoring Plan

The Trenching and Spoil Disposal Management and Monitoring Plan (TSDMMP) (Doc No. BAS-210 0023) outlines the environmental impacts and risks arising from the trenching and spoil disposal activities associated with DPD project activities and details how these impacts and risks will be monitored and managed, including via the implementation of an adaptive monitoring and management strategy.

This TSDMMP addresses trenching activities that have been undertaken within the proposed trench and pre-sweep areas between the pipeline shore pull onshore termination point to the Commonwealth/NT waters boundary and the disposal of trenched material at the nominated DPD spoil disposal within NT waters.

The implementation of the TSDMMP commenced on 15th June 2024, with implementation ongoing until the cessation of trenching activities on 1 December 2024.

During the current reporting period, there were no non-compliances identified relating to the TSDMMP (refer to Appendix A for further information).

2.1.4 Marine Megafauna Noise Management Plan

The Marine Megafauna Noise Management Plan (MMNMP) (BAS-210 0045) details the impacts associated with underwater noise-generating activities during construction of the DPD pipeline in NT waters, in particular trenching

activities in Darwin Harbour, and the measures in place to prevent significant impacts to marine megafauna from underwater noise.

The MMNMP identifies a range of measures to manage and mitigate potential environmental impacts to marine megafauna due to underwater noise emissions from construction of the DPD pipeline in NT waters, including the implementation of the marine megafauna observation and adaptive management protocol.

The implementation of the MMNMP commenced on 15th June 2024, with implementation ongoing at the end of the reporting period.

During the current reporting period, there were no non-compliances identified relating to the MMNMP (refer to Appendix A for further information).

2.1.5 Onshore Construction Environment Management Plan

The Onshore CEMP (Doc No. BAS-210 0025) details the environmental impacts and risks associated with the construction of the onshore pipeline and demonstrates how these will be reduced to an acceptable level. The Onshore CEMP was prepared to provide guidance on environmental management approach, measures and requirements, to ensure that the DPD project pipeline construction activities on NT land were undertaken in an environmentally responsible manner and in line with regulatory requirements.

The Onshore CEMP covers the 200-metre onshore section of the DPD pipeline, extending from the onshore termination point (approximately 2 metres above highest astronomical tide) to the upstream weld of the beach valve. The remaining offshore section, from the termination point to the Commonwealth/NT waters boundary, was managed separately under the DPD Offshore CEMP (Section 2.1.2).

The implementation of the Onshore CEMP commenced on 1st May 2024, with implementation still ongoing at the end of the reporting period.

During the current reporting period, there were no non-compliances identified relating to the Onshore CEMP (refer to Appendix A for further information).

2.1.6 Acid Sulfate Soil Dewatering Management Plan

The ASSDMP (Doc No. BAS-210-0049) details environmental management measures to reduce the risk and impact from acid sulfate soil and/or acidic groundwater encountered during onshore construction. The ASSDMP applies to the proposed earthworks associated with the intertidal and onshore area of the DPD project pipeline construction. The area is located within the DLNG Facility approved disturbance footprint.

The implementation of the ASSDMP commenced on 1st May 2024.

During the reporting period, the ASSDMP was revised (Revision 1) and submitted to DCCEE on 13 November 2024 in accordance with Condition 7 of EPBC Approval (2022/09372), with implementation commencing on 11 December 2024 and still ongoing at the end of the reporting period.

During the current reporting period, there were no non-compliances identified relating to the ASSDMP (refer to Appendix A for further information).

3. New Environmental Risks

During the reporting period, no new environmental risks were identified.

4. References

Department of Climate Change, Energy, the Environment and Water (DCCEEW). 2023. Annual Compliance Report Guidelines, Canberra. CC BY 4.0.

Appendix A EPBC Approval Condition Compliance Table

Note:

- **Compliant:** 'Compliance' is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
- **Non-Compliant:** A designation of 'non-compliant' must be given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
- **Not Applicable:** A designation of 'not applicable' must be given where the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition that applies to an activity that has not yet commenced.

EPBC Condition Number	Condition	Is the project compliant with this condition	Evidence/Comments
Part A – Avoidance, Mitigation and Compensation Conditions			
1	To avoid and mitigate harm to protected matters, the approval holder must not undertake the Action outside the project area.	Compliant	No Action was undertaken outside the project area during the reporting period. Post construction survey logs were provided showing the maximum extent of the disturbance footprint at the DLNG site and shore crossing, including: • Temporary rock groyne • Anchor pit • Trench The survey logs demonstrate that all activities/actions were undertaken within the site since project commencement.
2	To avoid and mitigate impacts on the environment of Commonwealth marine areas and avoid and mitigate harm to protected matters within the project area, the approval holder must: a) Ensure that no significant impact to protected matters occurs from potentially harmful substances released into the marine environment during any pre-construction and/or construction activities. b) Ensure that a Marine Fauna Observer is present at all times during daylight hours during pre-construction and construction operations and continuously monitors and records marine fauna present in the observation zone and is adequately equipped to do so.	Compliant	a). To ensure compliance with the environmental performance objective of no significant impact to protected matters from potentially harmful substances released into the marine environment during pre-construction and/or construction activities (Condition a), all chemicals with the potential for planned release to the marine environment were assessed and approved in accordance with established procedures Santos Offshore Division Operations Chemical Approval Procedure (EA-91-II-10001). Specifically, chemical assessments were conducted under both the legacy ABU-W Chemical Management Procedure (ALL/HSE/PRO/044) and the Santos Offshore Division Operations Chemical Approval Procedure (EA-91-II-10001). These procedures ensure that only chemicals with acceptable

EPBC Condition Number	Condition	Is the project compliant with this condition	Evidence/Comments
	c) Cease any hydraulic hammering, or use of an Xcentric Ripper tool, or operation of trenching equipment at the direction of the Marine Fauna Observer if marine fauna are sighted within the exclusion zone. d) Ensure that, if operations have ceased in accordance with condition 2.c), that use of an Xcentric Ripper tool and/or operation of trenching equipment does not recommence until marine fauna have moved away from the exclusion zone and have not been observed for a minimum of 10 minutes. e) Ensure that, if operations have ceased in accordance with condition 2.c), that hydraulic hammering does not recommence until marine fauna have moved away from the exclusion zone and have not been observed for a minimum of 30 minutes. f) Initiate a soft start procedure during any initial or subsequent startup activities involving hydraulic hammering, and/or use of an Xcentric Ripper tool, and/or operation of trenching equipment, and if operations have ceased in accordance with condition 2.c) and the requirements of condition 2.d) have been met.		environmental profiles are approved for use, with consideration of their toxicity, bioaccumulation, and persistence in the marine environment. This rigorous assessment process ensured that only pre-approved, low-risk chemicals were used in marine operations, thereby avoiding any significant impacts to protected matters. This condition was captured in the Barossa Environmental Assurance Register (BEAR) - Darwin Pipeline Duplication (DPD) Project (BAS-210 0024) and the DPD Vessel Presence and Assurance Activity Register (BAS-210 0195). As per the Monthly Recordable Incident Reports (BAS-210 0039 ECAP Planned Reporting Submission Tracker), there were no unplanned spills to the marine environment during the reporting period that resulted in significant impact to protected matters. b). The requirement to ensure that a Marine Fauna Observer is present at all times during daylight hours during pre-construction and construction operations was communicated to all key vessel crew members, including masters and mates, via the DPD Vessel Masters Awareness Package (BAS-210 0056) and Barossa MFO Training Package – (BAS-210 0257) prior to the commencement of operations. As per the Monthly Recordable Incident Reports (BAS-210 0039 ECAP Planned Reporting Submission Tracker), there were no instances of non-compliance with marine fauna for the duration of the activity. For the duration of the activity, all vessels maintained MFO sighting forms specifically DPD NT MFO Duty Log (Form B) (as per DPD Vessel Presence and Assurance Activity Register (BAS-210 0195)) and followed all management measures and / or adaptive management requirements as per the MMNMP and Offshore CEMP. c) To mitigate potential impacts on marine fauna from underwater noise-generating activities, DPD implemented a

EPBC Condition Number	Condition	Is the project compliant with this condition	Evidence/Comments
			comprehensive awareness and procedural framework. All key vessel crew members, including masters and mates, received and acknowledged the DPD Vessel Masters Awareness Package (BAS-210 0056) and Barossa MFO Training Package – (BAS-210 0257) prior to the commencement of operations. This package, together with the DVO Soft Start Procedure, outlines all operational underwater requirements related to equipment noise and interactions with marine fauna. While hydraulic hammering was not conducted during the project, trenching activities and the use of the Xcentric Ripper tool were carried out in accordance with environmental conditions. During operations within DPD NT Waters, vessel crews completed the DPD NT MFO Adaptive Management Protocol – Form C, ensuring that appropriate mitigation and response measures were in place when a marine fauna was sighted. These operational protocols were clearly displayed on the bridges of the relevant dredge vessels to ensure visibility and adherence by all crew. In accordance with the conditions of approval, operations involving trenching and the Xcentric Ripper tool were to cease immediately at the direction of the Marine Fauna Observer (MFO) upon the sighting of marine fauna within the designated exclusion zone. This procedure was integrated into daily operational practices to ensure full compliance and effective environmental management throughout the project. d). The DPD Vessel Masters Awareness Package (Document BAS-210 0056), along with the DVO Soft Start Procedure, and the Barossa MFO Training Package (BAS-210 0257) outlines the operational requirements for managing underwater noise and mitigating interactions with marine fauna during the use of an Xcentric Ripper tool and/or operation of trenching equipment. These documents specify procedures for equipment shutdown, fauna observation, and conditions under which

EPBC Condition Number	Condition	Is the project compliant with this condition	Evidence/Comments
			operations may resume, ensuring compliance with environmental regulations. All key vessel personnel including Masters, Mates, and other operational crew received and acknowledged this awareness package prior to the commencement of project activities. In accordance with environmental requirements, if operations were ceased due to the presence of marine fauna (as per Condition 2.c), they did not recommence until marine fauna had been visually confirmed to have moved out of the exclusion zone and had not been sighted for a continuous period of at least 10 minutes. This observation period was strictly adhered to before any trenching or use of the Xcentric Ripper resumed and the DPD NT Marine Fauna Observer (MFO) Adaptive Management Protocol – Form C was completed to demonstrate compliance with condition 2d. To support compliance, all relevant protocols and visual guidance materials were prominently displayed on the bridge of the associated dredge vessels, ensuring high visibility and awareness among all bridge personnel. The MFO observation forms were sent in weekly and captured on the DPD Vessel Presence and Assurance Activity Register (BAS-210 0195). e). Please note no hydraulic hammering took place during the reporting period. f) To ensure compliance with Condition f, a Soft Start Procedure was developed and implemented for all trenching vessels involved in the project. This procedure outlines the potential underwater noise impacts on marine fauna and defines the specific commitments and mitigation measures in place to reduce associated risks. The soft start protocol was consistently applied prior to any initial or subsequent startup activities involving trenching

EPBC Condition Number	Condition	Is the project compliant with this condition	Evidence/Comments
			equipment or use of an Xcentric Ripper tool. It was also engaged following any operational pauses in accordance with Condition 2.c) and only resumed after confirming the requirements of Condition 2.d) had been met (i.e., marine fauna were no longer present in the exclusion zone). To ensure awareness and effective implementation, the soft start procedure was incorporated into the: • DPD Vessel Masters Awareness Package (BAS-210 0056) • Barossa Marine Fauna Observer (MFO) Training Package (BAS-210 0257) In addition, the use of the DPD NT Marine Fauna Observer (MFO) Adaptive Management Protocol – Form C confirmed that soft start procedures were always initiated as required. This process was verified and documented for all relevant startup events. These measures ensured that the project fully complied with Condition f, with no deviations from the required soft start protocols during the reporting period.
Action Management Plans			
3	To avoid and mitigate impacts on any underwater cultural heritage in the environment of Commonwealth marine areas, the approval holder must: a) Submit a Protocol for Protecting Underwater Cultural Heritage (PPUCH) within the Commonwealth marine area to the department for the Minister's approval which must include: i) Details of how any underwater cultural heritage present within the Commonwealth marine area will be avoided. ii) Detailed impact control and management measures (if required) to ensure no harm to any underwater cultural heritage present within the Commonwealth marine area.		The DPD Project Protocol for Protecting Underwater Cultural Heritage (PPUCH) (BAS-210 0265) was submitted for approval on 3 June 2024 and accepted in writing by a delegate of the Minister for Environment and Water on 14 June 2024. The PPUCH was implemented from the acceptance date onwards, prior to any DPD Project activities impacting the seafloor in the Commonwealth marine area.

EPBC Condition Number	Condition	Is the project compliant with this condition	Evidence/Comments
	iii) A commitment to engage a suitably qualified underwater archaeologist to advise on any items of potential underwater cultural heritage identified during construction and any related activities impacting the sea floor (if required). iv) Detailed procedures and reporting to be implemented if underwater cultural heritage is discovered, including a commitment to notify the department within 21 calendar days of identifying any underwater cultural heritage of clear archaeological character identified by a suitably qualified underwater archaeologist. v) Details of the process to be followed where any variations are required to be made to the PPUCH, including a requirement for any revised PPUCH to be submitted to the department for the Minister's approval, unless taking the action in accordance with the revised PPUCH would not be likely to have a new or increased impact. b) Not commence the Action unless the Minister has approved the PPUCH in writing. c) Implement the PPUCH prior to the commencement of any activities involving impact to the sea floor.		
4	The approval holder must implement the following Action Management Plans to avoid and mitigate harm as a result of the Action on protected matters. The approval holder must commence implementing each management plan from the commencement of the Action and continue to implement them at least until the completion of the Action. a) Acid Sulfate Soils and Dewatering Management Plan b) Marine Megafauna Noise Management Plan c) Trenching and Spoil Disposal Management and Monitoring Plan d) Onshore Construction Environmental Management Plan e) Offshore Construction Environmental Management Plan	Compliant	As per Section 2.1, all listed Management Plans were implemented during the reporting period. The collective records for assurance against these plans are detailed within the Barossa Environmental Assurance Register (BEAR) - Darwin Pipeline Duplication (DPD) Project (BAS-210 0024) and the DPD Vessel Presence and Assurance Activity Register (BAS-210 0195), which track the implementation of requirements included in each Action Management Plan from the commencement of the action through to the completion of the Action. The respective Action Management Plans were implemented on the following dates, which align with the date that actions relevant to the plan were first carried out: a) 1st May 2024 (Rev 0); and 11th December 2024 (Rev 1)

EPBC Condition Number	Condition	Is the project compliant with this condition	Evidence/Comments
			b) 15 th June 2024 c) 15 th June 2024 d) 1 st May 2024 e) 15 th June 2024 (Rev 0); 10 th January 2025 (Rev 1); and 15 th April 2025 (Rev 2)
5	The approval holder must achieve the following environmental outcomes in implementing the plans required under condition 4): a) No significant impact to protected matters from intertidal or onshore earthworks relating to the Acid Sulfate Soils and Dewatering Management Plan. b) The environmental performance objective of no significant impacts to protected marine fauna from noise generated during the DPD construction activities, and performance criteria detailed in table 8-2 of the Marine Megafauna Noise Management Plan. c) All environmental performance objectives and performance criteria detailed in table 8-2; 8-9; 8-13; 8-16; 8-19; 8-21; 8-23; 8-26 ;8-29 ;8-31; and 8-34 of the Trenching and Spoil Disposal Management and Monitoring Plan. d) All environmental performance objectives and performance criteria detailed in table 7-2 to table 7-18 inclusive, of the Onshore Construction Environmental Management Plan. e) All environmental performance objectives and performance criteria detailed in table 7-5 to table 7-41 inclusive, of the Offshore Construction Environmental Management Plan.	Compliant	All environmental performance objectives and performance criteria detailed in Table 8-2 of the Marine Megafauna Noise Management Plan were met during the annual reporting period. This includes the objective of ensuring no significant impacts to protected marine fauna from noise generated during DPD construction activities. a) During the reporting period, there were no significant impacts to protected matters resulting from intertidal or onshore earthworks associated with the Acid Sulfate Soils and Dewatering Management Plan. No acid sulfate soils were encountered in the intertidal zone or during onshore works. All key vessel personnel operating in the intertidal zone completed the contractor's Acid Sulfate Soil Identification Training. Additionally, all key onshore personnel completed the contractor's NT Environmental Induction as part of the Onshore Construction Environmental Management Plan (CEMP), which includes detailed requirements for Acid Sulfate Soils and Dewatering. These requirements were incorporated and verified through the pre-mobilisation and execution checklists, ensuring environmental compliance was maintained throughout the reporting period and tracked with the DPD Vessel Presence and Assurance Activity Register (BAS-210 0195). b) To ensure compliance with the environmental performance objective of no significant impacts to protected marine fauna from noise generated during DPD construction activities (Condition b), a Marine Fauna Observer (MFO) was present at

EPBC Condition Number	Condition	Is the project compliant with this condition	Evidence/Comments
			all times during daylight hours throughout pre-construction and construction operations. This requirement was communicated to all relevant vessel crew members, including masters and mates, via the DPD Vessel Masters Awareness Package (BAS-210 0056) and the Barossa MFO Training Package (BAS-210 0257) prior to the commencement of operations. Throughout the duration of the activity, there were no recorded instances of non-compliance related to marine fauna, as documented in the Monthly Recordable Incident Reports (BAS-210 0039 ECAP Planned Reporting Submission Tracker). All vessels consistently maintained MFO sighting records using the DPD NT MFO Duty Log B, in accordance with the DPD Vessel Presence and Assurance Activity Register (BAS-210 0195). Additionally, all vessels adhered to the marine fauna noise management measures and any applicable adaptive management requirements set out in the MMNMP and the Offshore CEMP, thereby ensuring that the performance criteria detailed in Table 8-2 of the MMNMP were met and that no significant noise-related impacts occurred. These conditions were tracked in the Barossa Environmental Assurance Register (BEAR) - Darwin Pipeline Duplication (DPD) Project (BAS-210 0024) and the DPD Vessel Presence and Assurance Activity Register (BAS-210 0195) and the DPD NT Rapid/Monthly Environmental Inspection Checklist Execution (BAS-210 0270) during the reporting period. c). To ensure compliance with Condition c, all environmental performance objectives and performance criteria outlined in Tables 8-2; 8-9; 8-13; 8-16; 8-19; 8-21; 8-23; 8-26; 8-29; 8-31; and 8-34 of the TSDMMP were effectively implemented and monitored throughout the DPD construction activities. Premobilisation checks were conducted for all vessels prior to entry into the operational area to confirm that all required noise mitigation measures and environmental management controls were in place. These checks ensured readiness and compliance with the environmental performance criteria relevant to trenching and spoil disposal operations.

EPBC Condition Number	Condition	Is the project compliant with this condition	Evidence/Comments
			During the execution phase, ongoing verification of environmental performance was carried out using the DPD NT Rapid/Monthly Environmental Inspection Checklist Execution (BAS-210 0270). These inspections monitored adherence to the environmental conditions and mitigation requirements specified in the TSDMMP. All compliance records were documented in the DPD Vessel Presence and Assurance Activity Register (BAS-210 0195), which provided a detailed record of vessel activity, implemented mitigation measures, and assurance actions taken to protect environmental values, including marine fauna, throughout the reporting period. The combined application of these controls ensured that all relevant performance objectives and criteria under Condition c were met, with no recorded non-compliances d). To ensure compliance with Condition d, all environmental performance objectives and performance criteria outlined in Tables 7-2 to 7-18 inclusive of the Onshore CEMP were effectively implemented and monitored throughout the onshore construction phase. Prior to the commencement of works, comprehensive premobilisation and site readiness checks were carried out to verify that all environmental controls, mitigation measures, and monitoring procedures were established in alignment with the Onshore CEMP. During the construction phase, compliance with environmental requirements was monitored through routine inspections, audits, and assurance activities. These were systematically recorded and tracked using the Barossa Environmental Assurance Register (BEAR) – Darwin Pipeline Duplication (DPD) Project (BAS-210 0024), the DPD Vessel Presence and Assurance Activity Register (BAS-210 0195) and the Contractors Daily Site Inspections. These registers and checklists documented environmental performance, onshore activity, mitigation actions, and

EPBC Condition Number	Condition	Is the project compliant with this condition	Evidence/Comments
			verification of compliance with the environmental conditions detailed in the CEMP. All compliance records confirmed that no significant non-compliances occurred, and all relevant environmental performance objectives and criteria were met for the duration of the onshore construction activities. e) To ensure compliance with Condition e, all environmental performance objectives and performance criteria detailed in Tables 7-5 to 7-41 inclusive of the Offshore Construction Environmental Management Plan (CEMP) were implemented and rigorously monitored throughout the offshore construction phase. Prior to commencement, comprehensive premobilisation checks were conducted to confirm that all environmental controls, mitigation strategies, and monitoring procedures were in place and consistent with the Offshore CEMP requirements. During operations, ongoing compliance was ensured through regular environmental inspections, audits, and monitoring activities. These compliance efforts were systematically tracked and documented in the Barossa Environmental Assurance Register (BEAR) – Darwin Pipeline Duplication (DPD) Project (BAS-210 0024), the DPD Vessel Presence and Assurance Activity Register (BAS-210 0195) and the DPD NT Rapid/Monthly Environmental Inspection Checklist Execution (BAS-210 0270). These tools provided detailed records of vessel activities, implemented mitigation measures, environmental observations, and assurance actions, ensuring that all performance objectives and criteria were met. All compliance documentation confirms that no significant non-compliances were identified, demonstrating adherence to the environmental management commitments during the offshore construction works.

EPBC Condition Number	Condition	Is the project compliant with this condition	Evidence/Comments
Revision of Action Management Plans			
6	The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.	Not Applicable.	No Action Management Plans were revised for approval under section 143A of the EPBC Act.
7	The approval holder may choose to revise an action management plan approved by the Minister under conditions 4 and 5, or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the Action in accordance with the RAMP would not be likely to have a new or increased impact.	Yes	The following revised action management plans (RAMPs) were submitted under condition 7 (refer Section 2.1 for further detail): • Protocol for the Protection of Underwater Cultural Heritage (PPUCH) • Offshore Construction Environment Management Plan (CEMP) • Acid Sulfate Soil Dewatering Management Plan (ASSDMP) The taking of the Action in accordance with these RAMPs is not considered to result in a new or increased impact (refer Section 3).
8	If the approval holder makes the choice under condition 7 to revise an action management plan (RAMP) without submitting it for approval, the approval holder must: a) Notify the department electronically that the approved action management plan has been revised and provide the department with: i) An electronic copy of the RAMP. ii) An electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP. iii) An explanation of the differences between the approved action management plan and the RAMP.	Compliant	The submission of RAMPs under Condition 7 was done in accordance with Condition 8 in that: • Electronic copies of the RAMPs were provided including track change versions • Explanations were provided as to the differences between the approved action management plans and the RAMPs and the reasons why taking the Action in accordance with the RAMP would not result in a new or increased impact. • Notice of RAMP implementation dates were provided being at least 20 business days after the date of providing notice of the revision of the action management plan, unless an alternative date was agreed to in writing with the department.

EPBC Condition Number	Condition	Is the project compliant with this condition	Evidence/Comments
	iv) The reasons the approval holder considers that taking the Action in accordance with the RAMP would not be likely to have a new or increased impact. v) Written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the department. b) Subject to condition 10, implement the RAMP from the RAMP implementation date.		RAMPs were implemented from the implementation date.
9	The approval holder may revoke its choice to implement a RAMP under condition 7 at any time by giving written notice to the department. If the approval holder revokes the choice under condition 7, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under condition 7.	Not Applicable	Santos did not choose to revoke its choice of implementing a RAMP under Condition 7.
10	If the Minister notifies the approval holder that the Minister is satisfied that the taking of the Action in accordance with the RAMP would be likely to have a new or increased impact, then: a) Condition 7 does not apply, or ceases to apply, in relation to the RAMP. b) The approval holder must implement the action management plan specified by the Minister in the notice.	Not Applicable	The Minister has not notified Santos that the Minister is satisfied that the taking of the Action in accordance with the RAMP would be likely to have a new or increased impact.
11	At the time of giving the notice under condition 10, the Minister may also notify that for a specified period of time, condition 7 does not apply for one or more specified action management plans.	Not Applicable	The Minister has not notified Santos that the Minister is satisfied that the taking of the Action in accordance with the RAMP would be likely to have a new or increased impact.
Notification of Date of Commencement of the Action			
12	The approval holder must notify the department electronically of the date of commencement of the Action, within 5 business days following commencement of the Action.	Compliant	The following written notifications were sent to the department prior to the commencement of the Action. DPD project activities: written notification sent on 8 May 2024, Action commenced on 1 May 2024;

EPBC Condition Number	Condition	Is the project compliant with this condition	Evidence/Comments
			The collective evidence for these notifications are recorded within the Barossa DPD (NT) Project Consultation Log (BAS-210 0319).
13	The approval holder must not commence the Action later than five (5) years after the date of this approval decision.	Compliant	The Action commenced on 1 st May 2024 which was within five years of the approval decision (15 th March 2024).
Compliance Records			
14	The approval holder must maintain accurate and complete compliance records.	Compliant	Accurate and complete compliance records have been maintained including: • Barossa DPD (NT) Project Consultation and Notification Log (BAS-210 0319) • Monthly Recordable Incident Reports (BAS-210 0039 ECAP Planned Reporting Submission Tracker) • Barossa Environmental Assurance Register (BEAR) - Darwin Pipeline Duplication (DPD) Project (BAS-210 0024) • DPD Vessel Presence and Assurance Activity Register (BAS-210 0195) These records outline assurance activities and evidence that includes audits, site based and vessel inspections, training and inductions, plans and procedures.
15	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request. Note: Compliance records may be subject to audit by the department, or by an independent auditor in accordance with section 458 of the EPBC Act, and/or be used to verify compliance with the conditions. Summaries of the results of an audit may be published on the department's website or through the general media.	Compliant	All required records are maintained in a central compliance database and are available to the Department on request.
16	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the <i>Guidelines for</i>	Compliant	All monitoring data, surveys, maps and other spatial and metadata have been prepared in accordance with the <i>Guidelines for biological survey and mapped data</i> for EPBC Act projects.

EPBC Condition Number	Condition	Is the project compliant with this condition	Evidence/Comments
	<i>biological survey and mapped data</i> , Commonwealth of Australia 2018, or as otherwise specified by the Minister in writing.		
17	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the <i>Guide to providing maps and boundary data for EPBC Act projects</i> , Commonwealth of Australia 2021, or as otherwise specified by the Minister in writing.	Compliant	All monitoring data, surveys, maps and other spatial and metadata have been prepared in accordance with the <i>Guide to providing maps and boundary data</i> EPBC Act projects.
18	The approval holder must submit all monitoring data (including sensitive ecological data), surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the department within 20 business days of each anniversary of the date of this approval decision.	Compliant	Monitoring data submission was submitted via the EPBC business portal on 9 th April 2025, 18 business days following the anniversary date of the approval decision (15 th March 2024). As advised on 9 April 2025 there is further DPD Project environmental monitoring data to be collected following the first anniversary date of 15 March 2025 and this will be provided when available, and in any event, prior to 20 business days following the second anniversary date of 15 March 2026.
Annual Compliance Reporting			
19	The approval holder must prepare a compliance report for each 12-month period following the date of this approval decision (or as otherwise agreed to in writing by the Minister).	Compliant	This compliance report fulfills this requirement for the reporting period. The reporting period is 15 March 2024 to 14 March 2025
20	Each compliance report must be consistent with the <i>Annual Compliance Report Guidelines</i> , Commonwealth of Australia 2023.	Compliant	This compliance report is consistent with the <i>Annual Compliance Report Guidelines</i> (2023).
21	Each compliance report must include: b) Accurate and complete details of compliance and any non-compliance with the conditions and the plans, and any incidents. c) One or more shapefile showing all clearing of protected matters, and/or their habitat, undertaken within the 12-month period at the end of which that compliance report is prepared.	Compliant	This compliance report provides details of the compliance status of all conditions in the approvals. b). Accurate and complete compliance records have been maintained as per Condition 14, and there were no non-compliances against the conditions of the plans within the reporting period c). No clearing of EPBC Act listed species and/or their habitat has occurred to date.

EPBC Condition Number	Condition	Is the project compliant with this condition	Evidence/Comments
	d) A schedule of all plans in existence in relation to these conditions and accurate and complete details of how each plan is being implemented.		d). As per Conditions 4, 5 and 14
22	The approval holder must: a) Publish each compliance report on the website within 60 business days following the end of the 12-month period for which that compliance report is required. b) Notify the department electronically, within 5 business days of the date of publication that a compliance report has been published on the website. c) Provide the weblink for the compliance report in the notification to the department. d) Keep all published compliance reports required by these conditions on the website until the expiry date of this approval. e) Exclude or redact sensitive ecological data from compliance reports published on the website or otherwise provided to a member of the public. f) If sensitive ecological data is excluded or redacted from the published version, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website. Note: Compliance reports may be published on the department's website.	Compliant	a). Santos will publish the ACR on the Santos website within 60 business days of the 12-month anniversary of the EPBC approval decision. b). Santos will notify DCCEEW electronically within 5 business days of the date of publication confirming the ACR has been published on the Santos website. c) Santos will provide the weblink to the published ACR in its notification to DCCEEW. d) Santos will keep all published ACRs on its website until the expiry date of the EPBC approval decision. e) Not applicable – no sensitive ecological data formed part of the ACR f) Not applicable – no sensitive ecological data formed part of the ACR
Reporting Non-Compliance			
23	The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan.		During the reporting period there were no non-compliances with the conditions or commitments made in a plan
24	The approval holder must specify in the notification:		During the reporting period there were no non-compliances with the conditions or commitments made in a plan

EPBC Condition Number	Condition	Is the project compliant with this condition	Evidence/Comments
	a) Any condition or commitment made in a plan which has been or may have been breached. b) A short description of the incident and/or potential non-compliance and/or actual non-compliance. c) The location (including co-ordinates), date and time of the incident and/or potential non-compliance and/or actual non-compliance. Note: If the exact information cannot be provided, the approval holder must provide the best information available.		
25	The approval holder must provide to the department in writing, within 12 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance, the details of that incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan. The approval holder must specify: d) Any corrective action or investigation which the approval holder has already taken. e) The potential impacts of the incident and/or non-compliance. f) The method and timing of any corrective action that will be undertaken by the approval holder.		During the reporting period there were no non-compliances with the conditions or commitments made in a plan
Independent Audit			
26	The approval holder must ensure that an independent audit of compliance with the conditions is conducted at three (3) years after the commencement of the Action, and at any time upon the direction of the Minister.	Not Applicable	Three years has not passed since the commencement of the action and as such, an independent audit of compliance is not due. During the reporting period, there was no independent audit of compliance directed by the Minister.
27	For each independent audit, the approval holder must: a) Provide the name and qualifications of the nominated independent auditor, the draft audit criteria, and proposed timeframe for submitting the audit report to the department prior to commencing the independent audit.	Not Applicable	Three years has not passed since the commencement of the Action and as such, an independent audit of compliance is not due. During the reporting period, there was no independent audit of compliance directed by the Minister.

EPBC Condition Number	Condition	Is the project compliant with this condition	Evidence/Comments
	b) Only commence the independent audit once the nominated independent auditor, audit criteria and timeframe for submitting the audit report have been approved in writing by the department. c) Submit the audit report to the department for approval within the timeframe specified and approved in writing by the department. d) Publish the audit report on the website within 15 business days of the date of the department's approval of the audit report. e) Keep the audit report published on the website until this approval expires.		
28	Each audit report must report for the period preceding that audit report.	Not applicable	Three years has not passed since the commencement of the Action and as such, an independent audit of compliance is not due. During the reporting period, there was no independent audit of compliance directed by the Minister.
29	Each audit report must be completed to the satisfaction of the Minister and be consistent with the 'Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines, Commonwealth of Australia 2019'.	Not Applicable	Three years has not passed since the commencement of the Action and as such, an independent audit of compliance is not due. During the reporting period, there was no independent audit of compliance directed by the Minister.
Completion of the Action			
30	The approval holder must notify the department electronically 60 business days prior to the expiry date of this approval, that the approval is due to expire.	Compliant	This approval expires on 1 January 2056.
31	Within 20 business days after the completion of the Action, and, in any event, before this approval expires, the approval holder must notify the department electronically of the date of completion of the Action and provide completion data. The approval holder must submit any spatial data that comprises completion data as a shapefile.	Not Applicable	The Action has not yet been completed.

Appendix B Supporting Data

The following data/reports that have been provided separately on 9 April 2025:

- Trenching Monitoring Pilot Survey Technical Report (BAS-210 0185)
- Trenching Monitoring Pilot Survey Sample Site GIS files
- Trenching Monitoring Baseline Survey Technical Report (BAS-210 0314)
- Trenching Monitoring Baseline Survey Sample Site GIS files
- Pre-trenching Marine Fauna Reconnaissance Report (BAS-210 0320)
- Barossa Pipelay Artificial Light Modelling Report (BAS-210 0360)
- DPD Project Consolidated Marine Fauna Observation records
- DPD Project Metadata - Water and Sediment Sampling
- DPD Project Sediment Quality Data
- DPD Project Water Quality Data
- DPD Project Water Quality Profile Data