INTEGRATED ENVIRONMENTAL SYSTEMS PTY LTD

Santos GLNG EPBC Approval 2008/4057 – 2025 Audit Report

Audit of:

LNG Facility
Curtis Island, Queensland

Report prepared for:

Australian Government
Department of Climate Change, Energy, the Environment and Water

Report Version

Version	Date	Prepared by
Final Report	7 April 2026	Kurt Hammerschmid B.App.Sc. (Chem), M.Sc., MEIANZ Lead / Principal Auditor Integrated Environmental Systems Pty Ltd PO Box 323 Sorrento, Victoria 3943 Adam Jones B.Ec. LLB, B.Com, GradCertEnv Lawyer Suite 503, 9-13 Bronte Road Bondi Junction NSW 2022

Document Title and History

Document Title: Santos GLNG EPBC Approval 2008/4057 – 2025 Audit Report			
Version	**Description and Date**	**Issued by**	**Certified by**
Draft Report	Draft report for Santos review, issued 2 March 2026	Kurt Hammerschmid, Lead Auditor	Not applicable
Revised Draft Report	Revised draft report, issued 19 March 2026, for Santos to complete the Proponent's Responses in Appendix F as required by Approval condition 59(f). The revised draft report includes: a) revised audit findings based on additional information provided by Santos in response the draft report; b) revised observations arising from the Auditors' reconsideration of observations provided in the draft report; and c) minor revisions to improve the content and presentation of the audit report.	Kurt Hammerschmid, Lead Auditor	Not applicable
Final Report	Final report, issued 7 April 2026 and submitted to Santos. The final report includes: a) an updated Appendix B regarding approved extensions of time to submit this audit report to the Department of Climate Change, Energy, the Environment and Water; b) an updated Appendix F with the Proponent's Responses; and c) minor typographical revisions.	Kurt Hammerschmid, Lead Auditor	Kurt Hammerschmid, Lead Auditor

Cover page image: LNG Facility, Curtis Island (Santos GLNG website)

Issued by: (Kurt Hammerschmid)

Date: 7 April 2026

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1 Executive Summary

The Santos GLNG LNG Facility is a liquified natural gas facility located on Curtis Island, Queensland.

EPBC Approval 2008/4057 was issued by the then Australian Government Minister for Sustainability, Environment, Water, Population and Communities ("SEWPaC") on 22 October 2010.

The Approval identifies the 'Proponent' as Santos Limited and PETRONAS Australia Pty Limited. In this audit report, the Proponent is identified either as "Santos", "Santos GLNG" or "GLNG".

Santos GLNG engaged Integrated Environmental Systems Pty Ltd to conduct this independent audit, in response to a request in a letter dated 31 January 2025 from the Department of Climate Change, Energy, the Environment and Water ("DCCEEW" or "Department") under condition 57 of the Approval.

This December 2025 audit is the first independent audit conducted under the Approval. The 'audit period' for this audit is defined as the period from 11 April 2022 (the day nominated by the Department) to 4 December 2025 (the last day of the Auditor's on-site attendance at this audit, as agreed by the Department).

This audit was conducted in accordance with the *Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of the Environment Protection and Biodiversity Conservation Act 1999*, issued by the Department (2019).

The Department-approved audit team comprised Kurt Hammerschmid (Lead Auditor) and Adam Jones (Auditor).

The Auditor attended the Santos Brisbane office on 1st and 2nd December, and the LNG Facility on 3rd and 4th December 2025. The Auditor prepared this audit report.

The Lead Auditor reviewed the draft audit report prior to issue to Santos GLNG, and reviewed and approved the issue of the final version of this audit report.

The Approval includes 74 conditions, comprising 178 condition elements. The overall findings of this audit were:

- This audit identified 84 'compliance' findings, 3 'non-compliance' findings (see below), and 91 'not applicable' findings against the 178 condition elements.
- Santos GLNG was compliant with 84 out of the 87 applicable condition elements.

The three 'non-compliance' findings identified in this audit report relate to:

- Approval condition 55 (Compliance with State environmental and other authorities) – By letter of 14 May 2024, the then Queensland Department of Environment, Science and Innovation (DESI) notified Santos GLNG of a non-compliance against condition A15 of Queensland Environmental Authority No. EPPG00712213 (EA), regarding the requirement for Santos GLNG to obtain DESI's acceptance of the nominated third party auditor for an EA audit which was conducted in July 2023. This non-compliance against an EA condition resulted in a non-compliance against Approval condition 55.
- Approval condition 67(c) (Annual Environmental Return) – Santos GLNG did not report the non-compliance against Approval condition 55 in the relevant Annual Environmental Return.
- Approval condition 70 (Publication of Plans) – During the audit period, Santos GLNG did not publish the most recently approved version (Revision 6, April 2024) of the Long Term Turtle Management Plan on the Santos GLNG website (this non-compliance was subsequently corrected).

The above 'non-compliance' findings, with recommendations (required by Approval condition 59(e)), are included in Section 5 (Summary of Audit Findings) and Appendix A (Independent Audit Table) of this audit report.

This audit report includes 15 observations (refer to Section 4.7 in this audit report), about issues relevant to the protection of a matter of national environmental significance when the issue is not strictly related to compliance or non-compliance with a condition or element of a condition.

No systemic (i.e. widespread) non-compliance issues were identified by the Auditors during this audit. The Auditors consider that during the audit period, Santos GLNG maintained a very high standard of compliance against the conditions of the Approval.

2 Audit Reference Table

The Auditors conducted this audit in accordance with the *Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of the Environment Protection and Biodiversity Conservation Act 1999*, issued in 2019 by the Department of Climate Change, Energy, the Environment and Water ("Audit Guidelines").

Table 1 below cross-references the relevant section in the Department's Audit Guidelines to the section in this audit report where the Audit Guidelines section is addressed (second column).

Table 1: Audit Reference Table

Relevant section in the Audit Guidelines with summary of requirement	Audit report section where the Audit Guidelines section is addressed
Section 5.3 – Completing the auditor's declaration of independence form	Section 3.4 – Auditors' Independence Appendix D – Auditors' Declaration of Independence
Section 5.4 – Submitting the nominated auditor and associated documents	Appendix B – Audit Scope, Criteria and Methodology Appendix D – Auditor's Declaration of Independence
Section 5.5 – Reviewing and approving the nominated auditor and associated documents	Appendix C – Approval of Auditors
Section 6.1 – Details of the audit	Section 3 – Details of the Audit
Section 6.2 – Certification by the auditors	Section 3.5 – Auditors' Certifications Appendix E – Audit Report – Auditors' Certifications
Section 6.3 – Executive summary – The Executive Summary provides a high level summary of the audit findings. In particular, it is to include a summary of any non-compliance.	Section 1 – Executive Summary
Section 6.4 – Detailed audit findings – The approved audit criteria and methodology is to be incorporated into the report and used to set out the detailed audit findings.	Section 4 – Audit Methodology Appendix A – Independent Audit Table
Section 6.5 – Compliance findings – Compliance, Non-compliance, Not applicable, Observation	Section 4 – Audit Methodology Appendix A – Independent Audit Table

3 Details of the Audit

3.1 Audit Guidelines

Table 2 below provides details of the audit as required by Section 6.1 in the Department's Audit Guidelines, and includes additional information regarding the conduct of this audit.

Table 2: Details of the Audit

Name of the Project:	Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC No. 2008/4057. In this audit report, the Project is identified as the "LNG Facility".
Name of the Project Approval Holder/Proponent:	EPBC Approval 2008/4057 identifies the Proponent as comprising Santos Limited (ABN 80 007 550 923) and PETRONAS Australia Pty Limited (ACN 064 998 867). In this audit report, the Proponent is identified as "Santos", Santos GLNG" or "GLNG".
Details of the Approval to which the Audit relates:	The audit relates to EPBC Approval 2008/4057, issued by the then Australian Government Minister for Sustainability, Environment, Water, Population and Communities ("SEWPaC") on 22 October 2010. The Approval concerns the development, construction, operation and decommissioning of a multi-train liquified natural gas (LNG) processing facility (the LNG Facility) and associated onshore facilities within the Curtis Island Industry Precinct of the Gladstone State Development Area.
Scope of the Audit:	By letter of 31 January 2025 to Santos, the Department of Climate Change, Energy, the Environment and Water ("DCCEEW" or "Department") advised that: "The scope of the audit must relate to activities undertaken for the project during the audit period, and in relation with conditions of the approval." Subsequent correspondence between Santos and the Department (refer to Appendix B in this audit report) resulted in agreement to define the 'audit period' as commencing on 11 April 2022 (the date originally specified in the Department's letter of 31 January 2025), and ending on 4 December 2025 (the last day of the Auditor's on-site attendance at the LNG Facility).
Dates and locations where the Audit was conducted:	1st and 2nd December 2025: Off-site at the Santos office, 32 Turbot Street, Brisbane, Queensland. 3rd and 4th December 2025: On-site at the LNG Facility on Curtis Island, Queensland, operated by GLNG Operations Pty Limited.
Methods used to assess compliance:	The methods used to assess compliance with each condition and condition element of the Approval, are identified within Appendix A (Independent Audit Table) of this audit report. By letter of 25 July 2025 to Santos, the Department approved the audit criteria and methodology for this audit.
Evidence used to assess compliance:	The evidence used to assess compliance with each condition and condition element of the Approval, is identified within Appendix A (Independent Audit Table) of this audit report.
Audit Contact (Santos):	[redacted] – Acting Team Leader Environment – Eastern Queensland and NSW, Eastern AU & PNG EHSR
Lead Auditor (reviewed and approved this audit report for issue):	Kurt Hammerschmid B.App.Sc. (Chem), M.Sc., MEIANZ Lead / Principal Auditor Integrated Environmental Systems Pty Ltd PO Box 323 Sorrento, Victoria 3943
Auditor (conducted the Audit and prepared this audit report):	Adam Jones B.Ec. LLB, B.Com, GradCertEnv Lawyer Suite 503, 9-13 Bronte Road, Bondi Junction NSW 2022

Santos (GLNG) personnel interviewed during the Audit:	• [redacted] – Acting Team Leader Environment – Eastern Queensland and NSW, Eastern AU & PNG EHSR • [redacted] – Compliance Adviser – Eastern Australia and PNG • [redacted] – LNG Facility Site Operations Coordinator • [redacted] – Lead Environmental Advisor – Eastern Australia and PNG • [redacted] – Reliability Team Leader • [redacted] – Senior Reliability Engineer • [redacted] – Laboratory Technician
LNG Facility operational areas and facilities inspected by the Auditor during on-site attendance:	3rd December 2025 • Engineering surveillance room • Fire shed and spill response trailer • Sediment Basins 2 and 3 • Haul road gate and adjacent Gladstone Regional Council road • Stormwater diversion drains • Waste management shed 4th December 2025 • Beach valve from Gas Transmission Pipeline (at site boundary) • Fire breaks and swales • Ethylene and Propane tanks • LNG Train 1 Pit • LNG Train 1 infrastructure including pipes and dryer filter • LNG Train 1 Compressor deck • LNG Train 1 Gas Turbine Generator 1 (GTG1) • Water Treatment Plant • GLNG Laboratory

3.2 GLNG Project Background

The GLNG Project comprises the Gas Field Development (GFD) Project in central southern Queensland (EPBC Approval 2012/6615), the Gas Transmission Pipeline (EPBC Approval 2008/4096) between the GFD Project and the LNG Facility, the LNG Facility (GLNG Plant) on Curtis Island (EPBC Approval 2008/4057), and the LNG Marine Facility on Curtis Island (EPBC Approval 2008/4058).

The GLNG Project is an unincorporated joint venture established by the GLNG Joint Venture Agreement dated 13 January 2011, involving four Project Participants being Santos, Petronas, TotalEnergies and KOGAS (https://www.glng.com/about-us).

On behalf of the four Project Participants, GLNG Operations Pty Limited operates the Gas Transmission Pipeline, LNG Facility and LNG Marine Facility. Santos is the sole operator of the GFD Project.

In relation to the LNG Facility, EPBC Approval 2008/4057 (issued on 22 October 2010, and which remains the current version) identifies the ‘Proponent’ as Santos Limited and PETRONAS Australia Pty Limited.

Construction of the LNG Facility commenced on 27 April 2011. Practical completion of the first LNG train (Train 1) occurred on 1 February 2016. Practical completion of the second LNG train (Train 2) occurred on 30 July 2016.

“Commissioning” (as defined in the Approval) of Train 1 occurred on or around 7 August 2015, and first production of LNG from Train 1 occurred on 24 September 2015.

“Commissioning” (as defined in the Approval) of Train 2 occurred on or around 17 April 2016, and first production of LNG from Train 2 occurred on 25 May 2016.

Formal handover of the LNG Facility from Bechtel (the Engineering, Procurement, Construction and Commissioning Contractor) to Santos GLNG occurred on 6 October 2016.

The GLNG Project, inclusive of the LNG Facility on Curtis Isand, operated continuously throughout the audit period.

3.3 Audit Team

Integrated Environmental Systems Pty Ltd (the company engaged by Santos GLNG to conduct this audit) provides professional independent auditing services in several specialised areas of environmental management within the resource, chemical, oil and gas, primary production and utilities industries.

Kurt Hammerschmid (Lead Auditor) has more than 40 years' experience in resources and heavy industrial sectors including more than 28 years' experience as a full-time Lead Auditor.

As the Principal Auditor and Director of Integrated Environmental Systems Pty Ltd, Kurt Hammerschmid has extensive on-site environmental experience in the resources industry through previous employment with Energy Resources Australia at Ranger Uranium (NT), Comalco Minerals and Alumina at Weipa (Qld), Hamersley Iron at Dampier (WA) and Rio Tinto Environmental Services in Melbourne.

Kurt Hammerschmid holds a Bachelor's Degree in Environmental/Water Chemistry (1986) from the University of Canberra and a Master's Degree in Pollutant Loadings to the Hawkesbury/Nepean catchment, west of Sydney (Macquarie University, 1992).

Over the past 28 years, across 22 countries, Kurt Hammerschmid has conducted more than 800 environmental and integrated HSE Management System, HSE Legal Compliance and Environmental Performance Audits for a wide range of exploration, heavy industry and resource sector clients including Newmont Mining Limited, BHP Billiton, Rio Tinto, Santos, Origin Energy, MMG, Oz Minerals, Tiwest, Energy Resources Australia, Rio Tinto Alcan, Ok Tedi Mining, Oxiana, Resolute Mining, B2Gold, and Glencore Australia.

Adam Jones (Auditor) has more than 20 years' experience as a legal practitioner in NSW and has been regularly contracted by Integrated Environmental Systems Pty Ltd to conduct environmental compliance audits in NSW and Queensland. Adam Jones holds a Bachelor of Economics with Bachelor of Laws (Macquarie University, 1992), a Bachelor of Commerce (University of New South Wales, 1995), and a Graduate Certificate of Environment (Macquarie University, 2021).

3.4 Auditors' Independence

Each member of the audit team is independent from Santos GLNG. Appendix D of this audit report comprises the Auditors' Declaration of Independence Forms, as required by Section 5.3 in the Department's Audit Guidelines.

3.5 Auditors' Certifications

Appendix E of this audit report comprises the Auditors' Certifications regarding the information presented in this audit report, as required by Section 6.1 in the Department's Audit Guidelines.

3.6 Scope of the Audit

The Auditors included all 74 conditions of the Approval within the scope of this audit. These 74 conditions comprise a total of 178 condition elements, as identified in the Independent Audit Table within Appendix A of this audit report.

The 'audit period' for this audit is defined as the period from 11 April 2022 (the day nominated by the Department) to 4 December 2025 (the last day of the Auditor's on-site attendance at this audit, as agreed by the Department).

Other Australian Government EPBC Approvals relating to the GLNG Project were outside the scope of this audit. These other Approvals are:

- EPBC Approval 2008/4058 – LNG Marine Facility (issued on 22 October 2010);
- EPBC Approval 2008/4096 – Gas Transmission Pipeline (issued on 22 October 2010); and
- EPBC Approval 2012/6615 – Gas Field Development Project (issued on 22 March 2016, amended on 28 April 2021).

4 Audit Methodology

4.1 Selection and Endorsement of Auditors

Santos GLNG engaged Integrated Environmental Systems Pty Ltd to conduct this independent audit. Integrated Environmental Systems Pty Ltd comprised the audit team of Kurt Hammerschmid (Lead Auditor) and Adam Jones (Auditor).

The Department endorsed the appointment of the Auditors by letter of 24 March 2025. The Department's letter is reproduced in Appendix C of this audit report.

4.2 Compliance Evaluation

The Auditor assessed compliance with the conditions of EPBC Approval 2008/4057 by:

- interviews with relevant personnel and verification of compliance against relevant conditions in the field; and
- 'sampling' a representative range of requested documents, records and data associated with the LNG Facility.

The nature of sampling during any form of compliance audit is such that it may not necessarily identify everything that Santos GLNG is, or is not, doing in relation to an individual condition or condition element of the Approval. Refer to Section 6 (Limitations of the Audit) in this audit report.

This December 2025 audit is the first independent audit conducted under the Approval.

Having regard to the scope of the audit as defined by the Department in its letter of 31 January 2025 to Santos, the Auditors based their audit compliance findings (identified in the Independent Audit Table within Appendix A of this audit report) on whether an 'activity' or 'requirement' under a condition or condition element applied to the LNG Facility during the audit period (i.e. 11 April 2022 to 4 December 2025).

Numerous conditions and condition elements in the Approval are 'historical'; i.e. these relate only to an 'activity' (e.g. pre-clearance surveys, construction) or a 'requirement' (e.g. document submission deadline) which occurred prior to the audit period. For each 'historical' condition and condition element, the Auditors sourced and used available evidence to confirm historical compliance status. However, due to the defined audit period for this audit, the Auditors determined that 'not applicable' was the most appropriate audit finding for these 'historical' conditions and condition elements.

4.3 On-Site and Off-Site Interviews

The Auditor conducted on-site interviews (at the LNG Facility on Curtis Island) and off-site interviews (in Brisbane) with relevant GLNG personnel.

The personnel who were interviewed during this audit are identified in Table 2 (Audit Details) of this audit report.

Compliance assessment information provided by relevant personnel during this audit, is recorded in the Independent Audit Table within Appendix A of this audit report in the 'Evidence' and 'Documents Sighted' columns.

4.4 Site Inspections

The Auditor conducted site inspections during his attendance at the LNG Facility on 3rd and 4th December 2025. Table 2 (Audit Details) in this audit report identifies the operational areas and facilities which the Auditor inspected.

The 'Evidence' column in the Independent Audit Table within Appendix A of this audit report refers to specific operational areas and facilities which the Auditor inspected against relevant conditions and condition elements of the Approval.

4.5 Opening and Closing Meetings

The Auditor convened an opening meeting at the Santos Brisbane office on 1st December 2025, and a closing meeting at the Gladstone Marine Operations Terminal on 4th December 2025.

Personnel in attendance at the audit opening meeting in Santos's Brisbane office (1st December 2025)

- [redacted] – Senior Environmental Adviser – Santos
- [redacted] – Compliance Adviser – Santos Eastern Australia and PNG
- Adam Jones – Auditor

Personnel in attendance at the audit closing meeting at Marine Operations Terminal (4th December 2025)

- [redacted] – Acting Team Leader Environment – Eastern Queensland and NSW, Eastern AU & PNG EHSR – Santos
- [redacted] – Compliance Adviser – Santos Eastern Australia and PNG
- [redacted] – LNG Facility Site Operations Coordinator
- [redacted] – LNG Facility General Manager (via Microsoft Teams)
- Adam Jones – Auditor

At the opening meeting, the objectives of the audit, scope of the audit, evidence required and methodology to be applied were discussed.

At the closing meeting, preliminary audit findings were presented, preliminary recommendations were made, and post-audit actions and timing for preparation of this audit report were discussed.

4.6 Compliance Status Descriptors

The Auditors assessed Santos's compliance with each condition and condition element of EPBC Approval 2008/4057 in accordance with Section 6.5 in the Department's Audit Guidelines, using the following required compliance status descriptors.

Status	Description
Compliance	A rating of 'compliance' is given when the auditee has complied with a condition or element of a condition.
Non-compliance	A rating of 'non-compliance' is given when the auditee has not met a condition or an element of a condition.
Not applicable	A rating of 'not applicable' at the time of the audit is given when the condition or element of a condition falls outside the scope of the audit e.g. if an activity has not yet commenced or a requirement has not been triggered.

4.7 Observations

Section 6.5 in the Department's Audit Guidelines notes that: "An 'observation' may be made about issues relevant to the protection of a matter of national environmental significance when the issue is not strictly related to compliance or non-compliance with a condition or element of a condition."

The Auditors have made 15 observations in accordance with the Audit Guidelines. These observations are numbered and included in the Independent Audit Table within Appendix A of this audit report.

5 Summary of Audit Findings

5.1 Documents Reviewed

The Auditors conducted this independent audit in accordance with the Department's letter of 31 January 2025 and the Department's Audit Guidelines.

As part of this independent audit, the Auditor reviewed the relevant management plans and sub plans identified in EPBC Approval 2008/4057.

The Independent Audit Table within Appendix A of this audit report includes the Auditor's assessment of relevant management plans and sub plans. For example, in relation to Approval condition 28, the Auditor identified and assessed, on a 'sampling' basis, the implementation of relevant sub plans within the approved Santos GLNG August 2015 Operations Environment Management Plan.

Each condition and condition element in the Independent Audit Table within Appendix A of this audit report identifies the documents which the Auditor sighted (and reviewed) during this independent audit, against each condition and condition element of the Approval.

5.2 Compliance Performance

EPBC Approval 2008/4057 includes 74 conditions, comprising 178 condition elements. The overall findings of this audit were:

- This audit identified 84 'compliance' findings, 3 'non-compliance' findings, and 91 'not applicable' findings against the 178 condition elements.
- Santos GLNG was compliant with 84 out of the 87 applicable condition elements.

Table 3 below summarises Santos GLNG's compliance performance during the audit period against the conditions and condition elements of the Approval, as assessed and identified in this audit.

Table 3: Summary of Compliance Performance

Total of 74 conditions, comprising 178 condition elements	Compliance	Non-compliance	Not applicable
	84	3	91

No systemic (i.e. widespread) non-compliance issues were identified by the Auditors during this audit. The Auditors consider that during the audit period, Santos GLNG maintained a very high standard of compliance against the conditions of the Approval.

5.3 Non-compliances

This audit identified three 'non-compliance' audit findings. Approval condition 59(e) requires this audit report to include a recommendation for each non-compliance.

Table 4 below is extracted from the Independent Audit Table within Appendix A of this audit report and shows only the 'non-compliance' audit findings, with recommendations. For proper context, refer to the relevant condition or condition element in the Independent Audit Table.

Table 4: Identified Non-compliances, with Recommendations

Condition Number	Condition Requirement	Non-compliance	Recommendation
55.	The proponent must comply with all environmental authorisations issued by the State, including conditions of an environmental authority issued under the EP Act.	**Non-compliance No. 1** – By letter of 14 May 2024, the then Queensland Department of Environment, Science and Innovation (DESI) notified Santos GLNG of a non-compliance against condition A15 of Queensland Environmental Authority No. EPPG00712213 (EA), regarding the requirement for Santos GLNG to obtain DESI's acceptance of the nominated third party auditor for an EA audit which was conducted in July 2023.	**Recommendation No. 1** – Santos GLNG should review its administrative processes in relation to the identified non-compliance against EA condition A15.
67(c)	The proponent must produce an Annual Environmental Return which: (c) identifies all non-compliances with these conditions;	**Non-compliance No. 2** – The LNG Facility 2024 Annual Return did not identify the non-compliance against Approval condition 55 which resulted from the non-compliance against EA condition A15 which was notified by letter of 14 May 2024 from the then Queensland Department of Environment, Science and Innovation to Santos GLNG.	**Recommendation No. 2** – Santos GLNG should ensure that any non-compliance identified against an EA condition is also identified in the relevant LNG Facility Annual Return.
70.	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.	**Non-compliance No. 3** – As of 4 December 2025 (the end of the audit period), the current approved Long-Term Turtle Management Plan (Revision 6, April 2024) was not published on the Santos GLNG website. The Auditor acknowledges that: • as of 4 December 2025, an obsolete approved version (Revision 4, June 2015) of the Long-Term Turtle Management Plan was published on the Santos GLNG website; and • on 3 February 2026, Santos GLNG published the current approved Long-Term Turtle Management Plan (Revision 6, April 2024) on the Santos GLNG website.	**Recommendation No. 3** – Santos GLNG should review its administrative processes to ensure future compliance with this condition.

6 Limitations of the Audit

The scope of this independent audit included an assessment of Santos GLNG's compliance with the conditions of EPBC Approval 2008/4057, in accordance with the *Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of the Environment Protection and Biodiversity Conservation Act 1999*, issued by Department (2019).

The period covered by this independent audit ('audit period') is from 11 April 2022 (the day nominated by the Department) to 4 December 2025 (the last day of the Auditor's on-site attendance at this audit, as agreed by the Department).

This audit was conducted by interviews with relevant GLNG personnel and verification of compliance against relevant conditions in the field, and sampling a representative range of requested documents, records and data associated with the LNG Facility. The nature of 'sampling' during any form of compliance audit is such that it may not necessarily identify everything that Santos GLNG is, or is not, doing in relation to an individual condition or condition element of the Approval.

This audit was commissioned by Santos GLNG to comply with the Department's request of 31 January 2025, for the conduct of an audit under condition 57 of the Approval. No other warranty, expressed or implied, is made as to the professional advice indicated in this audit report. Note that this audit report may not contain sufficient information for the purposes of other parties or for other uses.

The content of this audit report applies only to matters which were available to and/or evident to the Auditor at the time of this independent audit and within the scope of the audit, as interpreted by the Auditor. The status of environmental compliance can change in a limited time, which may be important if the report is used after any protracted delay.

The Auditor selected site inspection locations with the aim of ensuring that a representative sample of operational facilities and activities could be inspected/audited against relevant conditions. Site inspections were conducted at selected locations and infrastructure associated with the LNG Facility and applicable to conditions of the Approval.

Compliance audits such as this independent audit have limitations. For example, time limitations during this audit limited the range of operational facilities and activities that could be inspected, and the extent of information that could be obtained and reviewed. Non-compliances may exist and not be detected.

The audit findings, recommendations and observations expressed in this audit report have been formed and are based on the above limitations.

This audit report does not, and does not purport to, give legal advice on the actual or potential liabilities of the operation, or draw conclusions as to whether any particular circumstances constitute a breach of relevant legislation. Only qualified legal practitioners who are retained to provide legal advice can provide this advice.

Appendix A:
Independent Audit Table

The Independent Audit Table which commences on the next page, provides detailed information regarding the audit findings (‘compliance’, ‘non-compliance’ and ‘not applicable’) identified in this independent audit against the conditions and condition elements of EPBC Approval 2008/4057.

In accordance with the Department’s Audit Guidelines, the Independent Audit Table also includes ‘observations’ about issues relevant to the protection of a matter of national environmental significance when the issue is not strictly related to compliance or non-compliance with a condition or element of a condition.

Appendix A: Independent Audit Table

EPBC Approval 2008/4057 (date of decision: 22 October 2010)
Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057
Proponent: Santos Limited and PETRONAS Australia Pty Limited

Date of issue of Audit Report (Final Report): 7 April 2026

This Independent Audit Table was prepared by Adam Jones (Auditor).

This Independent Audit Table was reviewed and approved by Kurt Hammerschmid (Lead Auditor).

Note: The Auditor prepared and the Department approved, the first three columns in this Independent Audit Table (including 'Verification Method'), prior to the conduct of this audit in December 2025. The Auditor prepared the final four columns in this table during the conduct of this audit.

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
1.	**LNG plant and ancillary onshore and marine facilities site** The LNG Facility site is the area on the map at Figure 1.	Audit interview Review Figure 1 of EPBC Approval Review aerial images of Curtis Island and LNG Facility	Santos GLNG maintains Geographic Information System (GIS) records of the LNG Facility, which include an outline of the LNG Facility site boundary shown in Figure 1 of the Approval. Figure 1 in this Approval is the same as Attachment 1 in EPBC Approval 2008/4058 (for the development of marine facilities such as a jetty and materials offloading facility to service the proposed LNG Facility).	Santos GIS aerial image of LNG Facility site as of 1 November 2025	The Santos GIS aerial image which shows the current physical extent of the LNG Facility site, is consistent with Figure 1 of the Approval.	Compliance
2(a)	**Visual impact of construction and operation** The proponent must minimise the visual impact of the construction and operation of the LNG Facility by: (a) constructing the LNG Facility within the site identified in Figure 1;	Audit interview Site inspection Review Figure 1 of EPBC Approval Review aerial images of Curtis Island and LNG Facility	Construction of the LNG Facility was completed in 2016, prior to the audit period. The LNG Facility site boundary has not changed since handover of the LNG Facility from Bechtel (Engineering, Procurement, Construction and Commissioning Contractor) to Santos GLNG on 6 October 2016.	Santos GIS aerial image of LNG Facility site as of 1 November 2015 Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001,	The LNG Facility was constructed and operates within the site boundary identified in Figure 1 of the Approval.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			The LNG Facility site in Figure 1 within Appendix 6: Site Clearing Boundary (Drawing 25576-100-CG-0000-00016) in the Bechtel 2013 CEMP), is consistent with Figure 1 of the Approval. Figure 1-1 in the October 2015 CEMP shows the LNG Facility site and associated marine facilities as the boundary from the PFL10 instrument (4 March 2011).	Revision 9 dated October 2015 (October 2015 CEMP) Construction Environmental Management Plan of LNG Facility (Appendix 2, GLNG Environmental Management Plan, in the October 2015 CEMP), Doc. No. 3310-BTH-3-3.3-6817, Revision 3 dated 5 December 2013 (Bechtel 2013 CEMP)		
2(b)	The proponent must minimise the visual impact of the construction and operation of the LNG Facility by: (b) applying a colour scheme to the LNG Facility and buildings, other than the LNG storage tanks and any necessary corrosion-protected structures and pipe insulation, from the palette of predominant colours found in the locality (Curtis Island) except where to do so would be in contravention of health and safety legislative requirements;	Audit interview Site inspection Review management plans, procedures and records relating to maintenance of LNG Facility and buildings	Table 4-8 (Operations Environmental Management Sub Plan – Visual Impact and Light) in the August 2015 OEMP includes the following relevant implementation strategy: "To minimise visual impact during operation of the LNG facility and associated marine infrastructure, GLNG is committed to applying a colour scheme to the facilities and buildings (excluding LNG storage tanks and any necessary corrosion-protected structures and pipe insulation) from the palette of predominate colours found around Curtis Island." In site inspections conducted on 3rd and 4th December 2025, the Auditor observed that consistent with the above implementation strategy, the colours of the LNG Facility and buildings generally blended into their surroundings.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP) Construction Environmental Management Plan of LNG Facility (Appendix 2, GLNG Environmental Management Plan, in the October 2015 CEMP), Doc. No. 3310-BTH-3-3.3-6817, Revision 3 dated 5 December 2013 (Bechtel 2013 CEMP) Operations Environment Management Plan to Address Matters of National Environmental Significance and Environmental Authority Conditions for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-5.1.3-0002, dated 17 August 2015 (August 2015 OEMP)	The colour scheme of the LNG Facility and buildings, other than the LNG storage tanks and necessary corrosion-protected structures and pipe insulation, is consistent with the palette of colours found in the locality, subject to legislated health and safety requirements in relation to use of colours (e.g. on pipelines and railings).	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			GLNG personnel stated that no new buildings were constructed on site during the audit period. GLNG personnel stated that some minor structures, including an EV shelter, muster point and BBQ shelter, were proposed for construction as of December 2025, and are intended to be finished in a 'surf mist' colour.			
2(c)	The proponent must minimise the visual impact of the construction and operation of the LNG Facility by: (c) ensuring site works minimise tree (including mangrove) clearing, with stabilisation and rehabilitation works on disturbed areas fully implemented within twelve months of completing each component of the LNG Facility (the worker accommodation facility and associated infrastructure; LNG storage tanks; and LNG trains and ancillary equipment and infrastructure); and	Audit interview Site inspection Review management plans, procedures and records relating to disturbance and clearing of land	GLNG personnel stated that during the audit period, site works involving vegetation clearing at the LNG Facility were limited to maintenance of existing disturbed areas. These site works included removal of vegetation to maintain: a) integrity of fire breaks; b) functionality of swales; and c) functionality of stormwater drainage infrastructure. In site inspections conducted on 3rd and 4th December 2025, the Auditor observed evidence of ongoing vegetation removal during maintenance activities associated with clearing fire breaks, swales and stormwater drainage infrastructure. Table 4-8 (Operations Environmental Management Sub Plan – Visual Impact and Light) in the August 2015 OEMP includes the following relevant implementation strategies: "Mitigation of visual impact (including lighting) was	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP) Construction Environmental Management Plan of LNG Facility (Appendix 2, GLNG Environmental Management Plan, in the October 2015 CEMP), Doc. No. 3310-BTH-3-3.3-6817, Revision 3 dated 5 December 2013 (Bechtel 2013 CEMP) Operations Environment Management Plan to Address Matters of National Environmental Significance and Environmental Authority Conditions for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-5.1.3-0002, dated 17 August 2015 (August 2015 OEMP) Santos "Diagram Description" (no document number or issue date)	During the audit period, site works involving vegetation clearing at the LNG Facility were limited to maintenance of existing disturbed areas.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			considered in the design, layout and construction of the facility which minimised clearing required and utilised the natural landscape to the extent possible to achieve screening of facilities. … In addition maintenance of treated earthworks (rehabilitated areas) will be maintained to promote vegetation establishment and visual amenity." GLNG personnel stated that the relevant operational control which prevents unauthorised site works is Santos's Integrated Disturbance Planning (IDP) Process.	of its Integrated Disturbance Planning (IDP) Process		
2(d)	The proponent must minimise the visual impact of the construction and operation of the LNG Facility by: (d) minimising light spill and direct views of lights outside the LNG Facility boundary except where to do so would be in contravention of health and safety legislative requirements.	Audit interview Site inspection Review management plans, procedures and records relating to lighting installation and maintenance	Table 4-8 (Operations Environmental Management Sub Plan – Visual Impact and Light) in the August 2015 OEMP includes the following relevant implementation strategy: "Potential impacts from lighting at the LNG facility are mitigated through the design height, orientation and shading/shrouding of lighting and controlling to the extent practical the frequency, duration and timing of gas flaring. To minimise light spills and directed light outside the LNG facility and associated marine facility, boundary lights are screened/hooded to the extent possible to restrict	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP) Construction Environmental Management Plan of LNG Facility (Appendix 2, GLNG Environmental Management Plan, in the October 2015 CEMP), Doc. No. 3310-BTH-3-3.3-6817, Revision 3 dated 5 December 2013 (Bechtel 2013 CEMP) Operations Environment Management Plan to Address Matters of National Environmental	During the audit period, Santos GLNG implemented measures including a street lighting upgrade, to further minimise the visual impact of the operation of the LNG Facility by minimising light spill and direct views of lights outside the LNG Facility boundary, except where to do so would be in contravention of health and safety legislative requirements.	Compliance

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			light to the immediate work area where needed." During the audit period, Santos GLNG completed one lighting-related project (MOC-GL-020963) to upgrade street lighting across the entire LNG Facility site from HPS (high pressure sodium) to LED streetlights. The LED streetlights were assessed in the MOC document (Section 3.1) as having less light spill than the HPS streetlights. During the audit period, Santos GLNG also prepared a draft MOC document for another lighting-related project (field light obsolescence) for potential replacement of HPS field lights with LED units. Section 2.1 (Environmental Considerations) in each MOC document considers potential impacts of the proposed lighting change on marine turtles, in terms of identifying suitable lighting types and wavelengths.	Significance and Environmental Authority Conditions for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-5.1.3-0002, dated 17 August 2015 (August 2015 OEMP) Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 6, April 2024 Change Owner's Package – MOC Background, dated 4 June 2024, for Street Lighting Upgrade, Management of Change No. MOC-GL-020963 Change Owner's Package – MOC Background (draft, not dated), for Field Lights Obsolescen[c]e Plan, Management of Change No. MOC-GL-024715		
3.	**Conduct of construction and operation workforce** The proponent must not bring private motor vehicles onto the LNG site, or private watercraft into waters within 100 metres of the LNG site boundary, except for activities directly relating to pre-clearance surveys, site clearance,	Audit interview Review management plans, procedures and records relating to site access	Section 2.1 in the GLNG Environmental Code of Conduct refers to this requirement. The GLNG Downstream Operations (DSO) Site Induction ('Things You Need to Remember' slide) refers to this requirement. GLNG personnel stated that during the audit period, except for	GLNG Project Curtis Island Environmental Protection Code of Conduct, Doc. No. 3301-GLNG-5-1.3-0059, dated 28 October 2015 (GLNG Environmental Code of Conduct) Online GLNG DSO Site Induction Sealink 'Booking Information Package' (8 pages) with client and	Based on information in the GLNG Environmental Code of Conduct, GLNG DSO Site Induction and MOT Vehicle Inspection Register records, the Auditor considers that Santos GLNG complied with the requirements of this condition. **Observation No. 1** – Santos GLNG should revise the content relating to private vehicles and	Compliance

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	and the construction and operation of the LNG facility.		activities directly relating to LNG Facility operations, GLNG has not brought: a) private motor vehicles onto the LNG Facility site; or b) private watercraft within 100 metres of the LNG Facility site boundary. Santos GLNG uses a specialist contractor, Sealink, for barge transport of vehicles (both GLNG and contractor) between Gladstone and the LNG Facility site. Sealink and Santos GLNG retain a MOT Vehicle Inspection Register for vehicles which have been booked on the Sealink barge, prior to loading onto the barge. The Sealink Booking Information Package refers to vehicle inspections, with a particular focus on declarations regarding weed hygiene and dangerous goods. Section 3.1 (Weed Hygiene Certification) states that: "All Vehicles with intended passage aboard RoRo Bruce must undergo a documented visual inspection by a nominated SeaLink representative after entering the MOT staging area." The MOT Vehicle Inspection Register records dates and times, vehicle registration numbers, company name, driver's name, inspection results (marked with a	legislative requirements for passage Santos Barge Booking Request form (Excel file) Completed 2025 MOT (Marine Operations Terminal) Vehicle Inspection Register records dated 8 August, 12 August, 17 August, 4 September, 19 September, 30 September, 31 October, 4 November, 7 November, 10 November, and 19 November	private watercraft in the GLNG Environmental Code of Conduct, to accurately reflect the wording of condition 3. Section 2.1 in the current GLNG Environmental Code of Conduct refers to "without written authorisation from GLNG management", which is not present in condition 3.	

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			tick) for 'boot/cargo area', 'interior of vehicle, 'bags/tool-boxes' and (marked with 'Nil') for 'non-compliance or suspect contraband', and inspector's (PPO) name.			
4.	**Conduct of construction and operation workforce** The proponent must not bring animals and plants (including domestic cats and dogs and other potential pests and weeds), other than for landscaping and rehabilitation purposes onto the LNG site, or onto Curtis Island. Note 1: For clarity, plants that are brought to Curtis Island for landscaping and rehabilitation purposes must be native Australian species sourced from the South Eastern Queensland and/or Brigalow Belt bioregion/s).	Audit interview Review management plans, procedures and records relating to restrictions on bringing animals and plants to site and Curtis Island, other than for landscaping and rehabilitation purposes	Section 2.2 in the GLNG Environmental Code of Conduct refers to this requirement. The GLNG DSO Site Induction ('Prohibited Items' section) includes information which relates to this requirement. Relevant GLNG personnel provide 'weed hygiene declarations' for each vehicle to the contractor, Sealink, when making barge booking requests. The Sealink Booking Information Package (section 1.0) states that: "All vehicles must have a current Weed Hygiene Certificate available on request at time of boarding." Refer to the evidence for condition 3 in relation to the MOT Vehicle Inspection Register. GLNG personnel stated that during the audit period, GLNG did not bring animals or plants onto the LNG Facility site or onto Curtis Island.	GLNG Project Curtis Island Environmental Protection Code of Conduct, Doc. No. 3301-GLNG-5-1.3-0059, dated 28 October 2015 (GLNG Environmental Code of Conduct) Online GLNG DSO Site Induction Sealink 'Booking Information Package' (8 pages) with client and legislative requirements for passage Completed 2025 MOT (Marine Operations Terminal) Vehicle Inspection Register records dated 8 August, 12 August, 17 August, 4 September, 19 September, 30 September, 31 October, 4 November, 7 November, 10 November, and 19 November Santos Barge Booking Request form (Excel file) 'Weed hygiene declaration' form (issued by the Queensland Government, form PR10_4996) which accompanies the Santos Barge Booking Request form	Based on information in the GLNG Environmental Code of Conduct, GLNG DSO Site Induction and MOT Vehicle Inspection Register records, the Auditor considers that Santos GLNG complied with the requirements of this condition.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
5.	**Conduct of construction and operation workforce** Entry into the Curtis Island Environmental Management Precinct, as identified in Figure 2, must be prohibited for all the proponent's construction workers, construction contractors, and its employees, whilst they are rostered on shifts or accommodated by the proponent on Curtis Island, except with the prior consent in writing of the authority responsible for the management of this Precinct.	Audit interview Site inspection Review Figure 2 of EPBC Approval Review management plans, procedures and records relating to the Curtis Island Environmental Management Precinct	Section 2.3 in the GLNG Environmental Code of Conduct refers to this requirement, and Figure 1 of the Code identifies the area covered by the CIEMP. The GLNG DSO Site Induction ('Things You Need to Remember' slide) includes information which relates to this requirement. As noted in the LNG Facility 2011 Annual Return, on 18 April 2011 the former Queensland Department of Employment, Economic Development and Innovation (DEEDI) provided approval for GLNG to access the CIEMP for defined purposes; i.e. spotters, catchers and environmental professionals could enter the CIEMP during and following the clearing of the LNG facility footprint, to ensure impacts to animal welfare and breeding areas were minimised. Physical controls which regulate access to the CIEMP include a single vehicular access point between the LNG Facility site and the CIEMP, which is accessible through a 'clipped' gate. All vehicles on site (GLNG and contractors) are GPS monitored for driver safety and to monitor potential unauthorised access to the CIEMP. As of December 2025, management of the CIEMP is the responsibility of the Queensland	GLNG Project Curtis Island Environmental Protection Code of Conduct, Doc. No. 3301-GLNG-5-1.3-0059, dated 28 October 2015 (GLNG Environmental Code of Conduct) Online GLNG DSO Site Induction GLNG Annual Environmental Return 2011 EPBC No 2008/4057 LNG Facility, Doc. No. 3310-GLNG-4-1.3-0008	Based on the GLNG Environmental Code of Conduct, GLNG DSO Site Induction and physical controls, the Auditor considers that Santos GLNG complied with the requirements of this condition. **Observation No. 2** – Santos GLNG could review Figure 1 (Curtis Island Environmental Management Precinct) in the GLNG Environmental Code of Conduct for consistency with: a) Figure 2 (Map of Curtis Island Environmental Management Precinct) of the Approval; and b) the CIEMP as identified in the August 2013 Monte Christo Offset Proposal (Ecofund Qld Pty Ltd). For example, discrepancies exist along the southern and western boundary, between the Precinct boundary identified in Figure 1 of the Code, against the Precinct boundary identified in Figure 2 of the Approval. A discrepancy could result in uncertainty whether CIEMP access requirements apply at a particular location. **Observation No. 3** – Santos GLNG could request the current manager of the CIEMP (QPWS) to issue written authorisation with the manager's consent for entry (for a suitable defined period) of GLNG employees and contractors for specified defined purposes (e.g. environmental monitoring, firefighting) which relate to the	Compliance

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			Parks and Wildlife Service (QPWS). The QPWS is part of the Queensland Department of the Environment, Tourism, Science and Innovation (DETSI).		operational phase of the LNG Facility.	
6.	**Conduct of construction and operation workforce** An induction program must be implemented for all the proponent's employees and sub-contractors at the time or before they commence work on Curtis Island.	Audit interview Review management plans, procedures and records relating to induction of employees and sub-contractors	Section 3 in the GLNG Environmental Code of Conduct refers to this requirement. The GLNG DSO Site Induction is an online course (approximately 30 minutes to complete), and must be completed as a prerequisite for access to entry onto Curtis Island (the Auditor included). GLNG personnel stated that as of December 2025, an Environmental Awareness Training Package for field operators is being progressively rolled out at the LNG Facility. This package will add to (i.e. not replace) the GLNG DSO Site Induction. As examples of implementation of the induction program, the Auditor sighted screenshots of completed training records for a GLNG employee and a contractor (Gidarjil) employee. Both records included the person's completion of the GLNG DSO Site Induction.	GLNG Project Curtis Island Environmental Protection Code of Conduct, Doc. No. 3301-GLNG-5-1.3-0059, dated 28 October 2015 (GLNG Environmental Code of Conduct) Online GLNG DSO Site Induction Environmental Awareness Training Package, Version 3 (PowerPoint document, 96 pages) Screenshot record of completed training (23 items) by a Santos GLNG employee, inclusive of the "GLNG DSO Site Induction" on 24 April 2025. Screenshot record of completed training (8 items) for a Santos GLNG contractor (Gidarjil), inclusive of the "GLNG DSO Site Induction" on 25 February 2025.	Based on the GLNG DSO Site Induction and the reviewed examples of completed training records, the Auditor considers that Santos GLNG complied with the requirement of this condition element. **Observation No. 4** – Santos GLNG should ensure that Appendix A (Approval Conditions relating to the GLNG Environmental Code of Conduct) in a future revision of the GLNG Environmental Code of Conduct, includes the full text of Approval condition 6; i.e. paragraphs (a) to (d) are currently omitted. **Observation No. 5** – Santos GLNG could enable persons who have completed the GLNG DSO Site Induction to download and save the course for later reference. At present, the only means by which an inducted person can access information presented in the course is to repeat the induction.	Compliance
6(a)	The induction program must include: (a) an overview that clearly explains to all the proponent's	Audit interview Review management plans,	The GLNG Environmental Code of Conduct refers to this requirement, but does not form part of any induction program.	GLNG Project Curtis Island Environmental Protection Code of Conduct, Doc. No. 3301-GLNG-5-1.3-0059, dated 28 October 2015	The Auditor considers that the GLNG DSO Site Induction satisfies the requirement of this condition element.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	employees and sub-contractors engaged on the construction and operation of the LNG Facility that they are working in a World Heritage Area and an explanation of the environmental values of the World Heritage Area;	procedures and records relating to induction of employees and sub-contractors	The GLNG DSO Site Induction (‘Environment’, ‘Marine Park Zoning’, and ‘Dugong Sanctuary’ slides) includes information which relates to this requirement.	(GLNG Environmental Code of Conduct) Online GLNG DSO Site Induction		
6(b)	The induction program must include: (b) information on listed species and ecological communities and other native species that are found in the area, and the related responsibilities of the proponent, its employees and subcontractors;	Audit interview Review management plans, procedures and records relating to induction of employees and sub-contractors	The GLNG DSO Site Induction (‘Environment’, ‘Marine Park Zoning’, and ‘Dugong Sanctuary’ slides) includes information which relates to this requirement.	GLNG Project Curtis Island Environmental Protection Code of Conduct, Doc. No. 3301-GLNG-5-1.3-0059, dated 28 October 2015 (GLNG Environmental Code of Conduct) Online GLNG DSO Site Induction	The Auditor considers that the GLNG DSO Site Induction satisfies the requirement of this condition element.	Compliance
6(c)	The induction program must include: (c) an explanation of the Rodds Bay Dugong Protection Area, and Great Barrier Reef Marine Park zoning on the eastern side of Curtis Island, Rodds Peninsula and the Capricorn Bunker group, and the responsibilities of the proponent, its employees and subcontractors within and in relation to these areas. This explanation must include the provision of maps depicting the zones, an explanation as to what can and cannot be done in the various zones, and information about how important the terrestrial and	Audit interview Review management plans, procedures and records relating to induction of employees and sub-contractors	The GLNG DSO Site Induction (‘Environment’, ‘Marine Park Zoning’, and ‘Dugong Sanctuary’ slides) includes information which relates to this requirement.	GLNG Project Curtis Island Environmental Protection Code of Conduct, Doc. No. 3301-GLNG-5-1.3-0059, dated 28 October 2015 (GLNG Environmental Code of Conduct) Online GLNG DSO Site Induction	The Auditor considers that the GLNG DSO Site Induction satisfies the requirement of this condition element. **Observation No. 6** – Santos GLNG could revise the GLNG DSO Site Induction to include a specific ‘Responsibilities’ section to directly address the requirement in this condition element to explain responsibilities of Santos GLNG, employees and sub-contractors within and in relation to the identified terrestrial and marine areas.	Compliance

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	marine environments of the Capricorn Bunker group are to conserving biodiversity within the Great Barrier Reef Marine Park; and					
6(d)	The induction program must include: (d) information that has the objective of fostering a culture of environmental awareness of the values of the area and also raises awareness among all employees and sub-contractors of the compliance and enforcement programs of the Great Barrier Reef Marine Park Authority and penalties that apply for offences.	Audit interview Review management plans, procedures and records relating to induction of employees and sub-contractors	The GLNG DSO Site Induction ('Environment', 'Marine Park Zoning', 'Dugong Sanctuary', 'Things You Need to Remember' and 'Bio Security' slides) includes information which relates to this requirement.	GLNG Project Curtis Island Environmental Protection Code of Conduct, Doc. No. 3301-GLNG-5-1.3-0059, dated 28 October 2015 (GLNG Environmental Code of Conduct) Online GLNG DSO Site Induction	The Auditor considers that the GLNG DSO Site Induction satisfies the requirement of this condition element.	Compliance
7.	**Conduct of construction and operation workforce** The obligations under conditions 3, 4, 5 and 6 must also apply to any visitors to the LNG site, or to Curtis Island, who are under the direction or control of the proponent.	Audit interview Review management plans, procedures and records relating to induction of visitors to site	Section 4.2 in the GLNG Environmental Code of Conduct refers to visitors to the LNG Facility site or Curtis Island, who are under the direction or control of Santos GLNG. The GLNG DSO Site Induction must be completed by visitors (which included the Auditor) to the LNG Facility site or Curtis Island, who are under the direction or control of Santos GLNG.	GLNG Project Curtis Island Environmental Protection Code of Conduct, Doc. No. 3301-GLNG-5-1.3-0059, dated 28 October 2015 (GLNG Environmental Code of Conduct) Online GLNG DSO Site Induction	Both the GLNG Environmental Code of Conduct and GLNG DSO Site Induction apply to visitors to the LNG Facility site or Curtis Island, who are under the direction or control of Santos GLNG.	Compliance
8(a)	**Conduct of construction and operation workforce** Within 20 business days of the final investment decision to proceed with the proposed action,	Audit interview Review the Curtis Island environment	According to a Santos ASX Media Release of 13 January 2011, the GLNG partners made the Final Investment Decision (FID) on 13 January 2011.	Santos ASX Media Release of 13 January 2011: https://www.santos.com/news/glng-project-sanctioned/	Santos GLNG complied with the requirement of this condition element. However, because this condition element relates to a previous	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	the proponent must submit to the Minister for approval: (a) a Curtis Island environment protection code of conduct for the construction workforce while on site and while travelling to and from the mainland and the construction site; and	protection code of conduct Review relevant correspondence between proponent and Department and/or Minister	Santos GLNG submitted the first version of the GLNG Environmental Code of Conduct, to the Minister on 11 February 2011; i.e. within 20 business days of 13 January 2011. The February 2011 version of the GLNG Environmental Code of Conduct related only to the construction phase of the LNG Facility. On 10 February 2016, the Department approved a revised GLNG Environmental Code of Conduct for the operational phase of the LNG Facility. Refer to the evidence for condition 11.	GLNG Project Curtis Island Environmental Protection Code of Conduct, Doc. No. 3301-GLNG-5-1.3-0059, dated 28 October 2015 (GLNG Environmental Code of Conduct) GLNG Annual Environmental Return 2011 EPBC No. 2008/4057 LNG Facility, Doc. No. 3310-GLNG-4-1.3-0008	'construction phase' version of the GLNG Environmental Code of Conduct which existed prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	
8(b)	Within 20 business days of the final investment decision to proceed with the proposed action, the proponent must submit to the Minister for approval: (b) a code of conduct implementation strategy for enforcing compliance with the Curtis Island environment protection code of conduct.	Audit interview Review the Curtis Island environment protection code of conduct and implementation strategy Review relevant correspondence between proponent and Department and/or Minister	Refer to the evidence for condition 8(a). The February 2011 GLNG Environmental Code of Conduct as submitted to the Minister on 11 February 2011, included an implementation strategy. The Auditor did not sight a copy of the February 2011 GLNG Environmental Code of Conduct. However, as noted in the evidence for condition 11, the revised GLNG Environmental Code of Conduct as approved by the Department on 10 February 2016, included only minor revisions to the implementation strategy.	Santos ASX Media Release of 13 January 2011: https://www.santos.com/news/glng-project-sanctioned/ GLNG Project Curtis Island Environmental Protection Code of Conduct, Doc. No. 3301-GLNG-5-1.3-0059, dated 28 October 2015 (GLNG Environmental Code of Conduct) GLNG Annual Environmental Return 2011 EPBC No. 2008/4057 LNG Facility, Doc. No. 3310-GLNG-4-1.3-0008	Santos GLNG complied with the requirement of this condition element. However, because this condition element relates to a previous 'construction phase' version of the GLNG Environmental Code of Conduct which existed prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
9.	**Conduct of construction and operation workforce** The code of conduct shall include, but not necessarily be limited to, the requirements set out in conditions 3, 4, 5 and 6.	Audit interview Review the Curtis Island environment protection code of conduct	The Auditor interprets this condition as applying to 'all' versions of the GLNG Environmental Code of Conduct. By letter dated 21 March 2011, the Minister approved the February 2011 GLNG Environmental Code of Conduct and implementation strategy. The Department's letter of 21 March 2011 stated that the Curtis Island environment protection code of conduct for the construction workforce and the associate code of conduct implementation strategy (i.e. the February 2011 GLNG Environmental Code of Conduct including the implementation strategy), fulfilled the requirements of conditions 3 to 9 of this Approval. By letter dated 10 February 2016, the Minister approved the October 2015 GLNG Environmental Code of Conduct. The Department's letter stated that the Code met the requirements of condition 3 to 9 of the Approval.	Letter dated 21 March 2011 from Department to Santos GLNG with approval of the Curtis Island environment protection code of conduct for the construction work force and the associated code of conduct implementation strategy (Santos reference: 2008/4057 – Letter-001-A) GLNG Project Curtis Island Environmental Protection Code of Conduct, Doc. No. 3301-GLNG-5-1.3-0059, dated 28 October 2015 (GLNG Environmental Code of Conduct) Letter dated 10 February 2016 with Department approval of Santos GLNG LNG Facility Environmental Protection Code of Conduct, Document Number 3301-GLNG-5-1.3-0059, GLNG Down Stream Operations Induction Requirements, Document Number 3310-GLNG-5-1.2-0007 and GLNG Downstream Operations Level 2 Induction V5 for the operational phase of the EPBC approval 2008/4057	Based on the Department's approval letter of 10 February 2016, the Auditor considers that the October 2015 GLNG Environmental Code of Conduct complied with the requirement of this condition.	Compliance
10.	**Conduct of construction and operation workforce** The approved Curtis Island environment protection code of conduct must be implemented.	Audit interview Site inspection Review the Curtis Island environment	The Auditor interprets this condition as relating to the February 2011 GLNG Environmental Code of Conduct, otherwise this condition would duplicate the third element of condition 11.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001,	Based on information in Section 5.3 of the October 2015 CEMP, the Auditor considers that Santos GLNG was likely to have implemented the February 2011 version of the GLNG Environmental Code of Conduct.	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
		protection code of conduct Review management plans, procedures and records relating to implementation of the Curtis Island environment protection code of conduct	Section 5.3 (Employee and Visitor Training) in the October 2015 CEMP refers to the GLNG Environmental Code of Conduct (i.e. the construction phase version of February 2011),includes content regarding obligations in the Code, and states that employees and visitors will also read and sign the Code.	Revision 9 dated October 2015 (October 2015 CEMP) GLNG Project Curtis Island Environmental Protection Code of Conduct, Doc. No. 3301-GLNG-5-1.3-0059, dated 28 October 2015 (GLNG Environmental Code of Conduct)	However, because this condition relates to a previous 'construction phase' version of the GLNG Environmental Code of Conduct which existed prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition.	
11.	**Conduct of construction and operation workforce** At least 60 business days before the commissioning of the first LNG train, the proponent must review, and if necessary revise, the Curtis Island environment protection code of conduct and implementation strategy and provide the Minister with evidence that this review has been carried out.	Audit interview Review records of proponent reviews of the Curtis Island environment protection code of conduct and implementation strategy Review relevant correspondence between proponent and Department and/or Minister	Refer to the evidence for condition 26. The Auditor considers that 'commissioning' of the first LNG train occurred on or around 7 August 2015. According to the LNG Facility 2025 Annual Return, on 13 July 2015 (i.e. less than 60 business days before commissioning of the first LNG train), Santos GLNG submitted to the Department, a copy of a review of the existing GLNG Project: Curtis Island Environmental Protection Code of Conduct, which includes (in Section 4) the implementation strategy for use during construction and commissioning. The LNG Facility 2025 Annual Return (condition 11 compliance	EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2025, dated 17 November 2025 GLNG Project Curtis Island Environmental Protection Code of Conduct, Doc. No. 3301-GLNG-5-1.3-0059, dated 28 October 2015 (GLNG Environmental Code of Conduct) Letter dated 10 February 2016 with Department approval of Santos GLNG LNG Facility Environmental Protection Code of Conduct, Document Number 3301-GLNG-5-1.3-0059, GLNG Down Stream Operations Induction Requirements, Document Number 3310-GLNG-5-1.2-0007 and GLNG Downstream Operations Level 2 Induction V5 for the operational phase of the EPBC approval 2008/4057	Based on information in the LNG Facility 2025 Annual Return and a commissioning date of 7 August 2015, Santos GLNG did not comply with the 'at least 60 business days' time limit requirement in this condition element. However, because this condition element relates to a review 'timing' requirement which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			note) described the review as follows: "As a result of the review for the construction and commissioning stages of the project, no changes were recommended to the existing Code of Conduct. However, the Project Orientation (Environmental section) which is used to implement the Code of Conduct and is considered to form part of the implementation strategy was updated to reflect changes to the project and reformatted.' The LNG Facility 2025 Annual Return records the relevant dates of completion of the review (13 July 2015) and submission to the Department (9 December 2015). The review was completed before commissioning of the first LNG train, but not by at least 60 business days. The Department's approval letter of 10 February 2016 to Santos GLNG stated that: "I note that the documents on the code of conduct of the construction workforce and associated implementation strategy were reviewed in accordance with the requirements of condition 11 of EPBC approval 2008/4057 and updated for the	EPBC Approval 2008/4057 Dictionary definition of "Commissioning" "LNG Journal – The World's Leading LNG publication – March 2017" (pages 1 to 4) article titled: "Australian operational focus leads to successful GLNG performance" "Milestones" document (Excel file) screenshot provided by Santos GLNG with dates for LNG Train 1 of 7 August 2015 for "inlet area pressured up" and 24 September 2015 for "make LNG", and corresponding dates of 17 April 2016 and 25 May 2016 for LNG Train 2 Santos ASX Media Release dated 24 September 2015 on Santos website: https://www.santos.com/news/2015-glng-starts-lng-production-on-schedule/		

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			operational phase of the project." The Auditor considers that the Department's letter of 10 February 2026 does not constitute a variation or waiver of the time limits specified in Approval condition 11.			
11.	If the Curtis Island environment protection code of conduct and/or implementation strategy are revised, the revised document or documents must be submitted to the Minister for approval within 20 business days of the review being finalised.	Audit interview Review records of proponent reviews of the Curtis Island environment protection code of conduct and implementation strategy Review relevant correspondence between proponent and Department and/or Minister	According to the LNG Facility 2025 Annual Return (condition 11 compliance note) Santos GLNG submitted the Operational Phase Environmental Induction material and GLNG Environmental Code of Conduct to the Department for review/approval on 9 December 2015. The submission date of 9 December 2015 was more than 20 business days after completion of the review on 13 July 2015.	EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2025, dated 17 November 2025 GLNG Project Curtis Island Environmental Protection Code of Conduct, Doc. No. 3301-GLNG-5-1.3-0059, dated 28 October 2015 (GLNG Environmental Code of Conduct) Letter dated 10 February 2016 with Department approval of Santos GLNG LNG Facility Environmental Protection Code of Conduct, Document Number 3301-GLNG-5-1.3-0059, GLNG Down Stream Operations Induction Requirements, Document Number 3310-GLNG-5-1.2-0007 and GLNG Downstream Operations Level 2 Induction V5 for the operational phase of the EPBC approval 2008/4057	Based on information in the LNG Facility 2025 Annual Return and a commissioning date of 7 August 2015, Santos GLNG did not comply with the 'within 20 business days' time limit requirement in this condition element. However, because this condition element relates to a submission 'timing' requirement which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable
11.	Once the Minister has approved in writing the revised code of conduct and/or implementation strategy, the approved code of	Audit interview Site inspection Review the Curtis Island	By letter dated 10 February 2016 to Santos GLNG, the Department approved: • the Santos GLNG LNG Facility Environmental	EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2025, dated 17 November 2025	The Auditor considers that there is sufficient evidence that Santos GLNG implemented the current approved GLNG Environmental	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	conduct and/or implementation strategy must be implemented.	environment protection code of conduct and implementation strategy Review management plans, procedures and records relating to implementation of the Curtis Island environment protection code of conduct	Protection Code of Conduct, Document Number 3301-GLNG-5-1.3-0059; • the GLNG Down Stream Operations Induction Requirements, Document Number 3310-GLNG-5-1.2-0007; and • the GLNG Downstream Operations Level 2 Induction V5. The Auditor only sighted the first approved document (i.e. the GLNG Environmental Code of Conduct) in the above list. The approved October 2015 GLNG Environmental Code of Conduct (including implementation Strategy), has not been revised since 10 February 2016. Section 1.9 in the August 2015 OEMP refers to the GLNG Environmental Code of Conduct (i.e. the current operational phase version of October 2015) and includes content regarding obligations in the GLNG Environmental Code of Conduct. Refer to the evidence for conditions 3, 4, 5 and 6 for evidence of implementation of the GLNG Environmental Code of Conduct.	GLNG Project Curtis Island Environmental Protection Code of Conduct, Doc. No. 3301-GLNG-5-1.3-0059, dated 28 October 2015 (GLNG Environmental Code of Conduct) Letter dated 10 February 2016 with Department approval of Santos GLNG LNG Facility Environmental Protection Code of Conduct, Document Number 3301-GLNG-5-1.3-0059, GLNG Down Stream Operations Induction Requirements, Document Number 3310-GLNG-5-1.2-0007 and GLNG Downstream Operations Level 2 Induction V5 for the operational phase of the EPBC approval 2008/4057 Online GLNG DSO Site Induction	Code of Conduct during the audit period. **Observation No. 7** – Santos GLNG could demonstrate improved implementation of the GLNG Environmental Code of Conduct (Code) by including the content of the Code in: • the GLNG DSO Site Induction – this induction does not identify which parts of the induction relate to the Code; and • the Environmental Training Awareness Package – Version 3 of the package refers to the Code (in slides 4 and 25) but does not identify which parts of the Package relate to the Code.	

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
12.	**Plan to secure and manage environmental offsets** An Environmental Offsets Plan to offset the loss of habitat and associated World Heritage and National Heritage values caused by the construction and operation of the LNG facility, must be developed.	Audit interview Review the Environmental Offsets Plan Review management plans, procedures and records relating to environmental offsets	The Monte Christo Offset Proposal dated 8 August 2013 (2013 MCOP) is the most recently issued Environmental Offsets Plan referred to in this Approval. The 2013 MCOP was developed by specialist consultant, Ecofund Qld, for the three LNG proponents (GLNG, APLNG and QCLNG). The 2013 MCOP was submitted to the Department on 15 August 2013. According to the LNG Facility 2025 Annual Return (condition 12 compliance note) the Department approved the 2013 MCOP on: • 27 September 2013 in relation to conditions 12, 13(a), 13(b), 14(a), 14(b), 14(e), 14(f), 14(g), 14(h), 15(a), 15(b), 16, 22(c) and 32(d) (Document reference number Ref:2013/01647); and • 20 December 2013 in relation to conditions 14(c) and 14(d) (no document reference number). With the exception of obligations to make ongoing financial contributions (refer to condition 15(c)), LNG proponent obligations under the 2013 MCOP (e.g. implementation of the Interim Offset Area Management Plan in Appendix B of the 2013 MCOP) ceased upon the transfer of the	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP) EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2025, dated 17 November 2025	Santos GLNG (as one of the three LNG proponents) complied with the requirement of this condition, to develop an Environmental Offsets Plan.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			Monte Christo property to the State of Queensland on 27 March 2019. Aspects of the 2013 MCOP (i.e. Sections 8.3.3 and 10.3) relating to ongoing financial contributions continued to apply to the LNG proponents during the audit period. On this basis, the Auditor considers that the 2013 MCOP continued to apply to Santos GLNG during the audit period.			
13(a)	**Plan to secure and manage environmental offsets** The Plan must address, but not necessarily be limited to, impacts on vegetation, biodiversity and landscape aesthetics arising from: (a) the development and operation of the LNG facility;	Audit interview Review the Environmental Offsets Plan Review management plans, procedures and records relating to environmental offsets	Section 6 (Summary of Impacts) and Table 8 in the 2013 MCOP describe and quantify (in terms of hectares impacted) the identified impacts of each of the three LNG projects on relevant environmental values.	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)	The 2013 MCOP satisfied the requirements of this condition element.	Compliance
13(b)	The Plan must address, but not necessarily be limited to, impacts on vegetation, biodiversity and landscape aesthetics arising from: (b) other activities on Curtis Island that are associated with the LNG Facility (including workers' accommodation facilities, port	Audit interview Review the Environmental Offsets Plan Review management plans, procedures and records relating to	Refer to the evidence for condition 13(a). Section 5.1 (Project impacts) in the 2013 MCOP noted that: "Impacts of the GLNG project as presented in **Section 6** are based on the following information: • the latest construction footprints provided by	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)	The 2013 MCOP satisfied the requirements of this condition element.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	works for the project, and ancillary works); and	environmental offsets	GLNG (GTP: 25 May 2012; development approvals for related marine facilities such as plant and port: 3 July 2012; **Appendix H**) • Table 6.2 of GLNG Gas Transmission Pipeline Significant Species Management Plan • the disturbance limits set out in environmental authorities (see **Table 2**)."			
13(c)	The Plan must address, but not necessarily be limited to, impacts on vegetation, biodiversity and landscape aesthetics arising from: (c) increased risks to biodiversity values of the World Heritage and National Heritage property arising from increased shipping movements and other subsequent or indirect impacts beyond the immediate development site such as water quality impacts and increased recreational access arising from the development and operation of the LNG facility.	Audit interview Review the Environmental Offsets Plan Review management plans, procedures and records relating to environmental offsets	Table 1 (EPBC Act approvals compliance matrix) in the 2013 MCOP noted (for GLNG Approval condition 13(c)), that: "The LNG proponents are in advanced discussions with the Great Barrier Reef Marine Park Authority (GBRMPA) to develop a strategy which will offset indirect impacts that includes specific funding agreements and identification of priority projects for the GBRMPA."	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)	The 2013 MCOP satisfied the requirements of this condition element.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
14(a)	**Plan to secure and manage environmental offsets** The Plan must detail: (a) the principles adopted in the Plan. These principles must reflect the objective of identifying, protecting, conserving, presenting, transmitting to future generations and, if necessary, rehabilitating, the World Heritage and National Heritage values of the Great Barrier Reef property;	Audit interview Review the Environmental Offsets Plan Review management plans, procedures and records relating to environmental offsets	Section 4 (Offset Principles) in the 2013 MCOP includes a description of the LNG proponents' strategic approach to offset delivery. Section 4.1 noted that: "The strategic approach is consistent with the principles underpinning key environmental offset policies produced by the Queensland and Australian Governments." Section 4.2 defined seven offset principles for the 2013 MCOP, including Principle 7, which was: "Offsets must be legally secured for the duration of the offset requirement."	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)	The 2013 MCOP satisfied the requirements of this condition element.	Compliance
14(b)	The Plan must detail: (b) the predicted total loss (in extent and type) of areas of ecological and aesthetic value, (including remnant vegetation, high value regrowth, significant conservation species, habitat, biodiversity corridors, scenic vistas of outstanding natural beauty);	Audit interview Review the Environmental Offsets Plan Review management plans, procedures and records relating to environmental offsets	Section 6 (Summary of Impacts) and Table 8 in the 2013 MCOP describe the predicted total impacts on environmental values, of the three LNG projects (GLNG, APLNG and QCLNG).	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)	The 2013 MCOP satisfied the requirements of this condition element.	Compliance
14(c)	The Plan must detail: (c) the methodology for identifying the requirements for environmental offsets for	Audit interview	Section 5 (Methods) in the 2013 MCOP describes the methodology used for identifying the requirements for environmental	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared	The 2013 MCOP satisfied the requirements of this condition element.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	specific components of the LNG Facility over the life of the project;	Review the Environmental Offsets Plan Review management plans, procedures and records relating to environmental offsets	offsets for specific components of the three LNG facilities over the life of each LNG project. Section 5.3.1 noted that: "Habitat suitability of potential offset areas has been estimated based on a review of habitat descriptions and listings in the Queensland Government Essential Habitat database (DNRM 2012) and on the presence of REs where the species is likely to occur."	by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)		
14(d)	The Plan must detail: (d) a proposed timeline for implementing the Environmental Offsets Plan;	Audit interview Review the Environmental Offsets Plan Review management plans, procedures and records relating to environmental offsets	Section 12 (Implementation Schedule) and Table 21 in the 2013 MCOP describe the proposed schedule (i.e. timeline) for implementation of the MCOP.	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)	The 2013 MCOP satisfied the requirements of this condition element.	Compliance
14(e)	The Plan must detail: (e) relevance to any Commonwealth or State government requirements for offsets;	Audit interview Review the Environmental Offsets Plan Review management plans, procedures and records relating	Section 7 (Summary of Offset Requirements) and Table 9 in the 2013 MCOP describe the offset requirements (under applicable Queensland and Australian legislation) which are proposed to be 'acquitted'.	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)	The 2013 MCOP satisfied the requirements of this condition element.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
		to environmental offsets				
14(f)	The Plan must detail: (f) in relation to any land retained at the time of preparation of the Plan, the location, size and environmental values of the offsets (land);	Audit interview Review the Environmental Offsets Plan Review management plans, procedures and records relating to environmental offsets	Section 8 (Environmental Values of the Proposal) and Table 11 in the 2013 MCOP describe the location, size and environmental values of the Monte Christo property.	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)	The 2013 MCOP satisfied the requirements of this condition element.	Compliance
14(g)	The Plan must detail: (g) in relation to any land retained at the time of preparation of the Plan, the management measures, including funding, required to secure, maintain and enhance the values of the proposed offset (land); and	Audit interview Review the Environmental Offsets Plan Review management plans, procedures and records relating to environmental offsets	Section 10 (Offset Management) and Appendix B (Monte Christo Interim Offset Area Management Plan) in the 2013 MCOP describes the management measures, including funding, required to secure, maintain and enhance the values of the Mont Christo property.	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)	The 2013 MCOP satisfied the requirements of this condition element.	Compliance
14(h)	The Plan must detail: (h) a system for reporting to the Minister on offset arrangements, their management and how offset values are being maintained.	Audit interview Review the Environmental Offsets Plan Review management	Section 11.2 (Monitoring and Reporting) in the 2013 MCOP includes a system for annual reporting to the Department and the Queensland Coordinator-General after surrender and transfer of the Monte Christo	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)	The 2013 MCOP satisfied the requirements of this condition element.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
		plans, procedures and records relating to environmental offsets	property to the Queensland Government.			
15(a)(i)	**Plan to secure and manage environmental offsets** The Environmental Offsets Plan must as a minimum include: (a) to offset direct impacts, the securing by the proponent of an offset property: (i) that contains attributes or characteristics at least corresponding with those of the LNG facility site; and	Audit interview Review the Environmental Offsets Plan Review management plans, procedures and records relating to environmental offsets	Section 8 (Environmental Values of the Proposal) and Section 9 (Offset Values of the Proposal) in the 2013 MCOP describe the environmental values of the Monte Christo property.	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)	The 2013 MCOP satisfied the requirements of this condition element.	Compliance
15(a)(ii)	The Environmental Offsets Plan must as a minimum include: (a) to offset direct impacts, the securing by the proponent of an offset property: (ii) at a ratio of no less than 5:1 of the LNG facility site area, excluding the proposed reclamation area (that is, a property of at least 1,200 ha in total area);	Audit interview Review the Environmental Offsets Plan Review management plans, procedures and records relating to environmental offsets	Section 8.1.1 (Location and size) in the 2013 MCOP states: "The offset area on the Monte Christo property is 3,562.10 ha in size consisting of 2,852.60 ha on lot 4 CP860403 (Leasehold), 256.82 ha on lot 297 and 452.68 ha on lot 298 DT4023 (Freehold; **Figure 5**)."	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)	The 2013 MCOP satisfied the requirements of this condition element.	Compliance
15(b)	The Environmental Offsets Plan must as a minimum include:	Audit interview	Section 11.1 (Securing mechanisms) in the 2013 MCOP describes the commitment by the LNG proponents to ensure the	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared	The 2013 MCOP satisfied the requirements of this condition element.	Compliance

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	(b) a commitment by the proponent to use its best endeavours to secure National Park status for the offset property. At a minimum the proponent must ensure the retention and management for conservation purposes, under a secure permanent land tenure arrangement, of the property.	Review the Environmental Offsets Plan Review management plans, procedures and records relating to environmental offsets	retention and management of the Monte Christo property for conservation purposes.	by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)		
15(c)	The Environmental Offsets Plan must as a minimum include: (c) to offset indirect impacts, a contribution of $200,000 per annum for the life of the project (indexed at CPI) and in addition $100,000 per annum (indexed at CPI) for each operating LNG Train (commencing upon commissioning of the relevant Train) to be provided to the Australian and Queensland Government's joint program of field management for the Great Barrier Reef World Heritage Area, for expenditure in the Mackay/Capricorn Section. Note 1: For clarity, contributions or offsets negotiated with the Queensland Government with respect to the LNG Facility site (e g. including under the Environmental Management Precinct Agreement) may, in whole or in part, meet the requirements of Condition 15(a).	Audit interview Review the Environmental Offsets Plan Review management plans, procedures and records relating to environmental offsets	In relation to GLNG Approval condition 15(c), Table 1 (EPBC Act approvals compliance matrix) in the 2013 MCOP provides an explanation of the intent and status of funding agreements to be negotiated with the GBRMPA and the Department (then known as SEWPaC).	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)	The 2013 MCOP satisfied the requirements of this condition element. **Observation No. 8** – Santos GLNG should record that Table 1 (EPBC Act approvals compliance matrix) in the August 2013 Monte Christo Offset Proposal includes inaccurate wording for GLNG Approval condition 15(c). For example, the Table 1 entry omits the Approval condition 15(c) references to "(indexed at CPI)".	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	Note 2: A Plan which sufficiently addresses the requirements of condition 15 will be considered to meet the purposes of the Plan as described in condition 13. Note 3: The joint program of field management is related to the objectives of the Great Barrier Reef Intergovernmental Agreement.					
16.	**Plan to secure and manage environmental offsets** Subject to condition 17, any property that is purchased or otherwise retained under a secure land tenure arrangement for the purposes of the Environmental Offsets Plan must be located within the Great Barrier Reef World Heritage Area, preferably on Curtis Island or nearby.	Audit interview Review the Environmental Offsets Plan Review management plans, procedures and records relating to environmental offsets	Section 8.1.1 in the 2013 MCOP states that the Monte Christo property is wholly located within the Great Barrier Reef World Heritage Area (GBRWHA) on Curtis Island and comprises: Lot 4 CP860403, Lots 297 and 298 DT4023. These Lots are outlined in Figure 3 of the 2013 MCOP.	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)	The Monte Christo property is wholly located within the GBRWHA on Curtis Island.	Compliance
17.	**Plan to secure and manage environmental offsets** If, within the Great Barrier Reef World Heritage Area, no area of land containing attributes or characteristics at least corresponding with those of the LNG facility site can be secured and protected in the manner described in condition 15 within 24 months of the Minister's approval of this project, an alternative proposal and timetable for acquiring (by purchase, lease or otherwise) property other than in	Audit interview Review the Environmental Offsets Plan Review management plans, procedures and records relating to environmental offsets Review relevant correspondence between	All offset properties are located within the GBRWHA. Section 3 in the 2013 MCOP noted that: "The Proposal is located wholly within the Great Barrier Reef World Heritage Area (GBRWHA) on Curtis Island". No alternative proposal and timetable for acquisition of offset property other than in the GBRWHA was required.	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)	This condition was never triggered, because an alternative proposal to acquire property other than in the GBRWHA was not required.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	the GBRWHA must be provided to the Minister for approval in writing.	proponent and Department and/or Minister				
18.	**Plan to secure and manage environmental offsets** To avoid doubt, the offset required under condition 15 is additional to any similar offset required under an EPBC Act condition of approval for another proponent for an LNG facility on Curtis Island.	Audit interview	Table 1 (for GLNG Approval condition 15(a)) in the 2013 MCOP indicates that the total minimum required area of the Monte Christo property for the three LNG proponents is 3,728 ha, comprising Santos GLNG – 1,200 ha, APLNG – 1,153 ha and QGC – 1,375 ha. The Monte Christo property area totals 3,562.3 ha. The 2013 MCOP included additional areas as described in the Executive Summary, which increased the total offset area to 5,753.1 ha. The total offset area exceeds the total required offset area under the Approvals for the three LNG proponents.	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)	The total offset area as described in the 2013 MCOP exceeded the total required offset area under the relevant EPBC Approvals for the three LNG proponents.	Compliance
19.	**Environmental Offsets Plan** Within 6 months of the date of this approval, the Environmental Offsets Plan must be submitted in writing for the approval of the Minister.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	Table 1 (for GLNG Approval condition 12) in the 2013 MCOP refers to a “LNG Facility Environmental Offsets Plan”. By email of 22 April 2011, Santos GLNG submitted a LNG Offset Plan (i.e. which the Auditor considers to be the above “LNG Facility Environmental Offsets Plan”), together with a CSG Offset Plan and a GTP Offset Plan, to the Department. By letter dated 6 May 2011, Santos GLNG submitted a hard	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP) Email of 22 April 2011 from Santos GLNG to Department which refers to three Environmental Offset Plans being available on the GLNG File Transfer Protocol (FTP) internet site	The Auditor considers that allowing for the minor (one day) exceedance of the six month time limit, Santos GLNG complied with the requirement in this condition element. However, because this condition element relates to a ‘submission’ requirement which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that ‘not applicable’ is the most appropriate audit finding for this condition element.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
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			copy of the above three Offset Plans to the Department. The LNG Offset Plan email submission date of 22 April 2011 is only marginally (i.e. by one day) after six months of the Approval date (22 October 2010).	Letter dated 6 May 2011 from Santos GLNG to Department with enclosed hard copies of three Environmental Offset Plans (LNG Offset Plan, CSG Offset Plan and GTP Offset Plan)		
19.	The approved plan must be implemented.	Audit interview Review the Environmental Offsets Plan Review management plans, procedures and records relating to implementation of the Environmental Offsets Plan	The Monte Christo Offset Proposal dated 8 August 2013 (2013 MCOP) is the most recently issued Environmental Offsets Plan referred to in this Approval. According to the LNG Facility 2025 Annual Return (condition 12 compliance note) the Department approved the 2013 MCOP on: • 27 September 2013 in relation to conditions 12, 13(a), 13(b), 14(a), 14(b), 14(e), 14(f), 14(g), 14(h), 15(a), 15(b), 16, 22(c) and 32(d) (Document reference number Ref:2013/01647); and • 20 December 2013 in relation to conditions 14(c) and 14(d) (no document reference number). The LNG Facility 2025 Annual Return (condition 12 compliance note) noted that: "On the 27 March 2019 Ownership of the property was transferred to 'The State of Queensland (Represented by Department of Natural Resources, Mines and	Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP) EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2025, dated 17 November 2025 Letter dated 12 March 2025 from the Department to Santos GLNG to re-establish payment arrangements as required by Approval condition 15(c), including the Department's proposed payment arrangements and proposed payment schedule Tax invoice no. 10015778 (dated 22 May 2025, due date 19 June 2025) issued by the Department to GLNG, for the 2024 contribution to the Reef Trust Special Account Payment receipt no. 111788 (dated 16 September 2025) issued by the Department to GLNG, for received payment of tax invoice no. 10017573 for the	During the audit period, Santos GLNG made the required annual financial contributions referred to in the 2013 MCOP.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			Energy)' as part of the offset commitment." Aspects of the 2013 MCOP relating to ongoing financial contributions (described in the evidence for condition 15(c)) continued to apply during the audit period. In relation to condition 15(c), the LNG Facility 2025 Annual Return (condition 15 compliance note) stated that: "In relation to 15(c) payments are being made by direct deposit into the Reef Trust Special Account. Payments are ongoing. Payment of $540,897.87 for funding the Reef Trust for 2024 was made on 19 June 2025. Department confirmed by email on 27 June 2025 that the payment was received. A Payment of $552,256.72 for funding the Reef Trust for 2025 was made on 16 September 2025. The Department confirmed by email on 22 October 2025 that the payment was received." The Auditor notes that the above dates of "2025" for "2024" funding are correct. The LNG Facility 2025 Annual Return does not provide an explanation for the apparent delay in "2024" funding.	2025 contribution to the Reef Trust Special Account		

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			By letter dated 12 March 2025, the Department notified Santos GLNG of the Department's intention to 're-establish' payment arrangements as required under Approval condition 15(c). Attachment A to the Department's letter of 12 March 2025 described the 'administrative arrangement' for annual payments, which will continue until 30 June 2034. Attachment B to the letter comprised a payment schedule, with estimated payments (based on an estimated CPI increase of 2.5% annually) to the Reef Trust from 2024-2025 to 2033-2034. Attachment B to the Department's letter of 12 March 2025 also records that during the audit period, GLNG paid the required annual contributions to the Reef Trust. The Auditor sighted evidence of GLNG's contributions to the Reef Trust for 2024 (Department tax invoice no. 10015778 dated 22 May 2025) and 2025 (Department receipt no. 111788 dated 16 September 2025).			
20.	**Construction and operation environmental management requirements and plans** At least one week before the commencement of clearance of native vegetation associated with the construction and operation of	Audit interview Review records relating to pre-clearance surveys	The Executive Summary in the February 2011 Pre-clearance Survey report noted that: "Pre-clearance surveys were undertaken between 21 and 23 January 2011 to fulfil Condition 20 of	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001,	Santos GLNG complied with the requirements of this condition. However, because this condition element relates to an activity (i.e. pre-clearance surveys) which occurred prior to the audit period (11 April 2022 to 4 December	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	the LNG facility, the proponent must undertake pre-clearance surveys to check for the presence or absence of listed ecological communities, listed threatened species, listed migratory species, their habitat, and species identified as contributing to the World Heritage and National Heritage values of the Great Barrier Reef World Heritage Area.	Review management plans, procedures and records relating to disturbance and clearing of land	Commonwealth EPBC Approval No. 2008/4057 for the GLNG LNG facility." Section 2.4.1 (Site Clearing and Earthworks) in the October 2015 CEMP stated that "Vegetation clearing commenced in Q2 2011", which is more than one week after the Pre-clearance surveys between 21 and 23 January 2011.	Revision 9 dated October 2015 (October 2015 CEMP) Report: GLNG LNG Facility Pre-clearance Survey for EPBC-Listed Fauna and Flora Species, Migratory Species and Ecological Communities, prepared by URS Australia, final version, reference 42626727/01/01, dated 17 February 2011	2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	
21(a)	**Construction and operation environmental management requirements and plans** Pre-clearance surveys must: (a) be undertaken consistent with the Department's survey guidelines in effect at the time of the survey. This information can be obtained from http://www.environment.gov.au/epbc/guidelines-policies.html#threatened;	Audit interview Review records relating to pre-clearance surveys Review Department's survey guidelines in effect at the time of relevant survey	Section 3 (Pre-Clearance Survey Methodology) in the February 2011 Pre-clearance Survey report stated that: "Survey methodology was designed to be consistent with DSEWPC survey guidelines for nationally threatened species (DSEWPC, 2011). These can be found at http://www.environment.gov.au/epbc/guidelines-policies.html#threatened."	Report: GLNG LNG Facility Pre-clearance Survey for EPBC-Listed Fauna and Flora Species, Migratory Species and Ecological Communities, prepared by URS Australia, final version, reference 42626727/01/01, dated 17 February 2011	The February 2011 Pre-clearance Survey report satisfied the requirement of this condition element. However, because this condition element relates to an activity (i.e. pre-clearance surveys) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable
21(b)	Pre-clearance surveys must: (b) take account and reference previous ecological surveys undertaken by the proponent for the area and relevant new information on likely presence or absence of MNES;	Audit interview Review records relating to pre-clearance surveys	Section 2 (Literature Review) in the February 2011 Pre-clearance Survey report refers to a range of previous ecological studies which the consultant, URS, reviewed to determine the potential presence of the following EPBC-listed values: • Ecological communities; • Threatened species;	Report: GLNG LNG Facility Pre-clearance Survey for EPBC-Listed Fauna and Flora Species, Migratory Species and Ecological Communities, prepared by URS Australia, final version, reference 42626727/01/01, dated 17 February 2011	The February 2011 Pre-clearance Survey report satisfied the requirement of this condition element. However, because this condition element relates to an activity (i.e. pre-clearance surveys) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			• Migratory species; • Habitat for threatened and migratory species; and • Species contributing to the World Heritage and National Heritage values of the Great Barrier Reef World Heritage Area. Table 2-1 in the report lists the potentially present communities and species, except 'Species contributing to the World Heritage and National Heritage values of the Great Barrier Reef World Heritage Area' of which none were identified in the previous studies as being potentially present. The 'References' list in the February 2011 Pre-clearance Survey report includes: • the Curtis Island Water Mouse, Powerful Owl and Wading Bird Investigations report, issued by Biodiversity Assessment and Management Pty Ltd (BAAM) (2009); • a draft LNG Facility Water Mouse Survey and Habitat Assessment report, issued by BAAM (2010); • a draft Significant Species Management Plan prepared by Ecologica Consulting (2010); and		appropriate audit finding for this condition element.	

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			• five ecological reports issued by URS Australia (two in 2008, one in 2010, and two in 2011).			
21(c)	Pre-clearance surveys must: (c) be undertaken by a suitably qualified ecologist approved in writing by the Department;	Audit interview Review records relating to pre-clearance surveys	Appendix A in the February 2011 Pre-clearance Survey report reproduces the Department's letter of 5 January 2011 to Santos GLNG (in reply to a Santos GLNG letter of 15 December 2010), with approval under condition 21(c) of five nominated ecologists. The approved persons comprised two ecologists from Biodiversity Assessment and Management Australia Pty Ltd (BAAM) and three ecologists from URS Australia Pty Ltd (URS).	Report: GLNG LNG Facility Pre-clearance Survey for EPBC-Listed Fauna and Flora Species, Migratory Species and Ecological Communities, prepared by URS Australia, final version, reference 42626727/01/01, dated 17 February 2011	The February 2011 Pre-clearance Survey was undertaken by suitably qualified ecologists from consultants, BAAM and URS. However, because this condition element relates to an activity (i.e. pre-clearance surveys) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable
21(d)	Pre-clearance surveys must: (d) document the survey methodology, targeted species and ecological communities, results and significant findings in relation to MNES; and	Audit interview Review records relating to pre-clearance surveys	Section 3 (Pre-Clearance Survey Methodology) in the February 2011 Pre-clearance Survey report documents the survey methodology; i.e. involving foot and vehicle traverses. Targeted species included: • Threatened Fauna (Section 3.2) – water mouse (*Xeromys myoides*); yakka skink (*Egernia rugosa*) and brigalow scaly-foot (*Paradelma orientalis*); and • Threatened Flora (Section 3.3) – *Bosistoa selwynii* (heart-leaved bosistoa), *Bosistoa transversa* (three-leaved	Report: GLNG LNG Facility Pre-clearance Survey for EPBC-Listed Fauna and Flora Species, Migratory Species and Ecological Communities, prepared by URS Australia, final version, reference 42626727/01/01, dated 17 February 2011	The February 2011 Pre-clearance Survey report satisfied the requirements of this condition element. However, because this condition element relates to an activity (i.e. pre-clearance surveys) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			bosistoa), *Bulbophyllum globuliforme* (miniature moss-orchid), *Cupaniopsis shirleyana* (wedge-leaf tuckeroo) and *Quassia bidwillii* (quassia). Section 4 (Results) in the February 2011 Pre-clearance Survey report stated that: "The pre-clearance surveys did not detect any EPBC-listed ecological communities, threatened species, migratory species or species contributing to the World Heritage and National Heritage values of the Great Barrier Reef World Heritage Area within the GLNG LNG facility site and determined that their presence is unlikely. This result supports the findings of previous studies of the site for the GLNG EIS and SEIS that similarly determined that these values were unlikely to be present."			
21(e)	Pre-clearance surveys must: (e) apply best practice site assessment and ecological survey methods appropriate for each listed threatened species, listed migratory species, their habitat, and listed ecological communities.	Audit interview Review records relating to pre-clearance surveys	Section 3 (Pre-Clearance Survey Methodology) in the February 2011 Pre-clearance Survey report stated that: "Survey methodology was designed to be consistent with DSEWPC survey guidelines for nationally threatened species (DSEWPC, 2011)."	Report: GLNG LNG Facility Pre-clearance Survey for EPBC-Listed Fauna and Flora Species, Migratory Species and Ecological Communities, prepared by URS Australia, final version, reference 42626727/01/01, dated 17 February 2011	Based on information in the February 2011 Pre-clearance Survey report, the Auditor considers that the ecologists applied 'best practice' site assessment and survey methods as required by this condition element. However, because this condition element relates to an activity (i.e. pre-clearance surveys) which	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			Section 3 in the report also stated that: "All potential species and ecological communities present were researched prior to the field studies to ensure positive identification in the field." Section 3.3 (Threatened Flora) in the report noted that: "Survey guidelines for these threatened species have not been published thus far by DSEWPC. The survey methods employed are considered suitable and best-practice for the conditions and habitat encountered."		occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	
21(e)	Pre-clearance survey reports (which document the methods used and the results obtained) must be published by the proponent on the internet before commencement and provided to the Department on request.	Audit interview Review internet publication dates of pre-clearance survey reports Review relevant correspondence between proponent and Department and/or Minister	Section 2.3 (Construction Milestone Schedule) in the October 2015 CEMP refers to 'Vegetation Clearance' as an 'Early Works step' with a 'start date' of Q2 2011. The above is consistent with the LNG Facility 2011 Annual Return, which records that construction (i.e. including vegetation clearance) of the LNG Facility commenced on 27 April 2011. Section 9.4.2 in a previous version of the Bechtel CEMP (Revision F, dated 9 February 2011), which was published on an archived version of the Santos GLNG website (17 May 2013) noted that:	GLNG Annual Environmental Return 2011 EPBC No 2008/4057 LNG Facility, Doc. No. 3310-GLNG-4-1.3-0008 Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP) Construction Environmental Management Plan of LNG Facility (Appendix 2, GLNG Environmental Management Plan, in the October 2015 CEMP), Doc. No. 3310-BTH-3-3.3-6817,	Based on archived Santos GLNG website information, the Auditor considers it is more likely than not, that Santos GLNG complied with the requirements of this condition element. However, because this condition element relates to a 'publication' requirement which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			"the Federal EPBC Approval contains the following conditions [and reproduces conditions 20 and 21] regarding pre-clearance surveys that will be addressed by GLNG prior to construction commencing." The Auditor considers that the above extract from the Bechtel CEMP indicates that Santos GLNG was aware of and intended to comply with this condition element, as part of condition 21. The February 2011 Pre-clearance Survey report was published on an archived version of the Santos GLNG website (17 May 2013). As of 4 December 2025, a link to the February 2011 Pre-clearance Survey report is published on the Santos GLNG website.	Revision 3 dated 5 December 2013 (Bechtel 2013 CEMP) Report: GLNG LNG Facility Pre-clearance Survey for EPBC-Listed Fauna and Flora Species, Migratory Species and Ecological Communities, prepared by URS Australia, final version, reference 42626727/01/01, dated 17 February 2011		
22.	**Construction and operation environmental management requirements and plans** If a listed ecological community or threatened species or migratory species or their habitat, is found during the pre-clearance surveys undertaken as required by condition 20, and is not specified in conditions 31-38 inclusive, the proponent must submit a separate management plan for each such species, ecological community or other MNES, to manage the	Audit interview Review records relating to pre-clearance surveys Review management plans, procedures and records relating to any threatened species, ecological	The February 2011 Pre-clearance Survey report (Conclusions section) concluded that: "Given that EPBC-listed values were not detected from the LNG facility site and that their presence is considered unlikely, additional specific management plans as stipulated under Condition 22 of EPBC Approval 2008/4057 are not required."	Report: GLNG LNG Facility Pre-clearance Survey for EPBC-Listed Fauna and Flora Species, Migratory Species and Ecological Communities, prepared by URS Australia, final version, reference 42626727/01/01, dated 17 February 2011	The February 2011 Pre-clearance Survey did not detect any of the EPBC-listed values referred to in condition 22. Therefore, separate management plans were not required.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	impacts of construction and operation of the LNG facility.	community or other MNES	Section 4 (Results) in the February 2011 Pre-clearance Survey report noted that: "The pre-clearance surveys did not detect any EPBC-listed ecological communities, threatened species, migratory species or species contributing to the World Heritage and National Heritage values of the Great Barrier Reef World Heritage Area within the GLNG LNG facility site and determined that their presence is unlikely. This result supports the findings of previous studies of the site for the GLNG EIS and SEIS that similarly determined that these values were unlikely to be present."			
22.	Each such plan must be submitted before the commencement of construction of the LNG facility.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	According to the LNG Facility 2011 Annual Return, construction of the LNG Facility commenced on 27 April 2011. Refer to the evidence for the first element of condition 22.	GLNG Annual Environmental Return 2011 EPBC No 2008/4057 LNG Facility, Doc. No. 3310-GLNG-4-1.3-0008 Report: GLNG LNG Facility Pre-clearance Survey for EPBC-Listed Fauna and Flora Species, Migratory Species and Ecological Communities, prepared by URS Australia, final version, reference 42626727/01/01, dated 17 February 2011	The February 2011 Pre-clearance Survey did not detect any of the EPBC-listed values referred to in condition 22. Hence, separate management plans were not required.	Not applicable
22(a)	Each plan must include: (a) a map of the location of species or species habitat in	Audit interview Review management	Refer to the evidence for the first element of condition 22.	Report: GLNG LNG Facility Pre-clearance Survey for EPBC-Listed Fauna and Flora Species, Migratory Species and Ecological	The February 2011 Pre-clearance Survey did not detect any of the EPBC-listed values referred to in condition 22. Hence, separate	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	relation to the LNG Facility and its associated infrastructure;	plans, procedures and records relating to any threatened species, ecological community or other MNES		Communities, prepared by URS Australia, final version, reference 42626727/01/01, dated 17 February 2011	management plans were not required.	
22(b)	Each plan must include: (b) a description of the measures that will be employed to avoid impact on the species or species habitat	Audit interview Review management plans, procedures and records relating to any threatened species, ecological community or other MNES	Refer to the evidence for the first element of condition 22.	Report: GLNG LNG Facility Pre-clearance Survey for EPBC-Listed Fauna and Flora Species, Migratory Species and Ecological Communities, prepared by URS Australia, final version, reference 42626727/01/01, dated 17 February 2011	The February 2011 Pre-clearance Survey did not detect any of the EPBC-listed values referred to in condition 22. Hence, separate management plans were not required.	Not applicable
22(c)	Each plan must include: (c) where impacts are unavoidable, and if an impacted species is not specified in conditions 32-39 inclusive, propose offsets to compensate for the impact on the population or impact on the species habitat	Audit interview Review management plans, procedures and records relating to any threatened species, ecological community or other MNES	Refer to the evidence for the first element of condition 22.	Report: GLNG LNG Facility Pre-clearance Survey for EPBC-Listed Fauna and Flora Species, Migratory Species and Ecological Communities, prepared by URS Australia, final version, reference 42626727/01/01, dated 17 February 2011	The February 2011 Pre-clearance Survey did not detect any of the EPBC-listed values referred to in condition 22. Hence, separate management plans were not required.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
23.	**Construction and operation environmental management requirements and plans** Before commencement the proponent must prepare a Construction Environmental Management Plan (CEMP).	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to the Construction Environmental Management Plan	The first version of the CEMP (issued by GLNG, Revision 1 dated February 2011) for the LNG Facility and Marine Facilities was submitted to the Department on 10 February 2011. By letter dated 21 March 2011, the Department approved the CEMP (Revision 1) for the site clearance and preparation stage only. Construction of the LNG Facility commenced on 27 April 2011. Refer to the evidence for condition 43.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP) Letter dated 21 March 2011 from Department to Santos GLNG with staged approval (for site clearance and preparation only) of the “Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities” dated 11 February 2011	The first CEMP for the GLNG Project was issued by Bechtel on 11 February 2011, before the commencement of construction of the LNG Facility on 27 April 2011. However, because this condition element relates to a ‘preparation’ requirement which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that ‘not applicable’ is the most appropriate audit finding for this condition element.	Not applicable
23.	The CEMP may be submitted in stages (Staged CEMP) in which case commencement of a stage covered by the staged CEMP cannot commence until submitted and approved by the Minister.	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to stages of the Construction Environmental Management Plan Review relevant correspondence	The first version of the CEMP (issued by GLNG, Revision 1 dated February 2011) for the LNG Facility and Marine Facilities was submitted to the Department on 10 February 2011. By letter dated 21 March 2011, the Department approved the CEMP (Revision 1) for the site clearance and preparation stage only. The LNG Facility 2025 Annual Return (conditions 23, 24 and 25 compliance note) described the progression of approvals by the Minister of subsequent versions of the CEMP:	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP) Letter dated 21 March 2011 from Department to Santos GLNG with staged approval (for site clearance and preparation only) of the “Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities” dated 11 February 2011	Based on information in the October 2015 CEMP and the LNG Facility 2025 Annual Return, the Auditor considers that Santos GLNG complied with the requirement of this condition element. However, because this condition element relates to a ‘submission’ requirement which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that ‘not applicable’ is the most appropriate audit finding for this condition element.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
		between proponent and Department and/or Minister	"The GLNG Project Construction Environmental Management Plan to address Matters of National Environmental Significance for the LNG Facility and Marine Facilities (CEMP for MNES) was approved by the Minister on 11 April 2011. Since then [i.e. approval of Revision 3 of the CEMP on 11 April 2011], GLNG have updated the CEMP for MNES to address requirements of the Queensland regulatory agencies and to reflect the general progression of the project. Revision 9 of the plan was approved by the Department on 25 October 2015. Construction of the LNG facility ceased in 2016." On 4 August 2014, the Minister approved Revision 7 of the CEMP (dated March 2014) for the construction (including commissioning) phase of the LNG Facility.	EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2025, dated 17 November 2025		
24.	**Construction and operation environmental management requirements and plans** The CEMP must address, but not necessarily be limited to, an identification of all activities with potential to adversely impact on	Audit interview Review the Construction Environmental Management Plan	Section 4 (Potential Impacts) in the October 2015 CEMP identifies activities and their potential adverse impacts on Matters of National Environmental Significance (MNES) during the construction phase. The following sections in the CEMP identified	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001,	The October 2015 CEMP satisfied the requirements of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	MNES proposed to be undertaken during the construction of LNG facilities, including the construction camp and supporting facilities.	Review management plans, procedures and records relating to the Construction Environmental Management Plan	the activities and/or potential adverse impacts: • Section 4.1 – Site Clearing; • Section 4.2 – Noise and Vibration; • Section 4.3 – Visual Aesthetics; • Section 4.4 – Lighting; • Section 4.5 – Discharges to Water; • Section 4.6 – World Heritage Areas and National Heritage Places.	Revision 9 dated October 2015 (October 2015 CEMP)	2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	
24(a)	The CEMP must include: (a) design plans showing the type and extent of the works proposed;	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to the Construction Environmental Management Plan	The October 2015 CEMP included design plans showing the type and extent of the works proposed. Refer to Figures 2.1 to 2.10 in the October 2015 CEMP.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP) Letter dated 21 March 2011 from Department to Santos GLNG with approval of CEMP documentation provided by Santos, except the Stormwater Management and Erosion and Sediment Control Plan in relation to the requirements of Approval conditions 24(a)-(d)	The October 2015 CEMP satisfied the requirements of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable
24(b)	The CEMP must include: (b) a construction schedule and methodology, including plans	Audit interview Review the Construction	The October 2015 CEMP included a construction schedule and methodology, including plans and maps showing discharge points	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility	The October 2015 CEMP satisfied the requirements of this condition element.	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	and maps showing discharge points and emission controls for all construction stages;	Environmental Management Plan Review management plans, procedures and records relating to the Construction Environmental Management Plan	and emission controls for all construction stages. Refer to Sections 2.2 to 2.10; Figure 2-8; and Figure 2-10 in the October 2015 CEMP.	and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP) Letter dated 21 March 2011 from Department to Santos GLNG with approval of CEMP documentation provided by Santos, except the Stormwater Management and Erosion and Sediment Control Plan in relation to the requirements of Approval conditions 24(a)-(d)	However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	
24(c)	The CEMP must include: (c) an environmental monitoring and a sampling program which details baseline data collection and provides the basis for ongoing monitoring of specified parameters for the construction and operational phases, including appropriate triggers for mitigation and cessation of works;	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to the Construction Environmental Management Plan	The October 2015 CEMP included an environmental monitoring and a sampling program which details baseline data collection and provides the basis for ongoing monitoring of specified parameters for the construction and operational phases, including appropriate triggers for mitigation and cessation of works. Refer to Section 6; and Appendix 2, Attachment H (GLNG Environmental Monitoring Plan) in the October 2015 CEMP. Appendix 1 in the GLNG Environmental Monitoring Plan comprises a Monitoring Matrix which encapsulates environmental monitoring, sampling, and specified parameters for construction and commissioning.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP) Letter dated 21 March 2011 from Department to Santos GLNG with approval of CEMP documentation provided by Santos, except the Stormwater Management and Erosion and Sediment Control Plan in relation to the requirements of Approval conditions 24(a)-(d), and the Receiving Environment Monitoring Program against the requirements of Approval condition 24(c)	The October 2015 CEMP satisfied the requirements of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
24(d)	The CEMP must include: (d) any potential impacts or effects of the proposed works on the environment during the construction and operational phases and the means by which adverse impacts will be avoided or mitigated;	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to the Construction Environmental Management Plan	The October 2015 CEMP included potential impacts or effects of the proposed works on the environment during the construction and operational phases and the means by which adverse impacts will be avoided or mitigated. Refer to Section 4; Section 5; and Appendix 2 in the October 2015 CEMP.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP) Letter dated 21 March 2011 from Department to Santos GLNG with approval of CEMP documentation provided by Santos, except the Stormwater Management and Erosion and Sediment Control Plan in relation to the requirements of Approval conditions 24(a)-(d)	The October 2015 CEMP satisfied the requirements of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable
24(e)(i)	The CEMP must include: (e) details of the sewage treatment plant and desalination plant, including: (i) design and operational performance information for sewage treatment and desalination (including acoustic performance of pumps and other machinery);	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to the Construction Environmental Management Plan	The October 2015 CEMP included details of the sewage treatment plant and desalination plant, including design and operational performance information for sewage treatment and desalination (including acoustic performance of pumps and other machinery). Refer to Sections 2.7 to 2.8; Appendix 1; and Appendix 2 in the October 2015 CEMP. GLNG personnel stated that the on-site sewage treatment plant was decommissioned and removed from site prior to the audit period. As of December 2025, the desalination plant remains	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP)	The October 2015 CEMP satisfied the requirements of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			operational to a limited extent; i.e. used for filtration of town-supplied potable water (removal of chlorides and cations).			
24(e)(ii)	The CEMP must include: (e) details of the sewage treatment plant and desalination plant, including: (ii) design and operational performance information for any outfalls and diffusers for emissions, including liquid and solid emissions into Port Curtis including detailed analysis of existing water quality, effluent contaminants, acute and chronic toxic effects of contaminants on fauna and flora and any long term ecological effects from outfalls and emissions;	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to the Construction Environmental Management Plan	The October 2015 CEMP included details of the sewage treatment plant and desalination plant, including design and operational performance information for any outfalls and diffusers for emissions, including liquid and solid emissions into Port Curtis including detailed analysis of existing water quality, effluent contaminants, acute and chronic toxic effects of contaminants on fauna and flora and any long term ecological effects from outfalls and emissions. Refer to Sections 2.6 to 2.9; Sections 4.5 to 4.12; Appendix 1; and Appendix 2 in the October 2015 CEMP.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP)	The October 2015 CEMP satisfied the requirements of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable
24(e)(iii)	The CEMP must include: (e) details of the sewage treatment plant and desalination plant, including: (iii) a detailed description of impacts from the discharge of treated sewage and brine. Source water quality data and characteristics of additives must be provided, and the	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to the	The October 2015 CEMP included details of the sewage treatment plant and desalination plant, including: • a detailed description of impacts from the discharge of treated sewage and brine; • provision of source water quality data and characteristics of additives;	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP)	The October 2015 CEMP satisfied the requirements of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	disposal methods to be used must be described in the plan. The information must be used to determine the site specific mitigation measures proposed, including monitoring and reporting regimes;	Construction Environmental Management Plan	• a description of the disposal methods to be used; and • determination of the site specific mitigation measures proposed, including monitoring and reporting regimes. Refer to Sections 2.6 to 2.9; Section 4.5; Appendix 1; and Appendix 2 in the October 2015 CEMP.			
24(e)(iv)	The CEMP must include: (e) details of the sewage treatment plant and desalination plant, including: (iv) information on the eco-toxicity of effluent at the point of release, in the mixing zone, and cumulative impacts of contaminants in the marine ecosystem over time;	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to the Construction Environmental Management Plan	The October 2015 CEMP included details of the sewage treatment plant and desalination plant, including information on the eco-toxicity of effluent at the point of release, in the mixing zone, and cumulative impacts of contaminants in the marine ecosystem over time. Refer to Section 4.5.1; and Appendix 1 in the October 2015 CEMP.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP)	The October 2015 CEMP satisfied the requirements of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable
24(e)(v)	The CEMP must include: (e) details of the sewage treatment plant and desalination plant, including: (v) the assumptions, adequacy and limitations of any modelling used to predict the dimensions	Audit interview Review the Construction Environmental Management Plan Review management	The October 2015 CEMP included details of the sewage treatment plant and desalination plant, including the assumptions, adequacy and limitations of any modelling used to predict the dimensions and duration of the mixing zone.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP)	The October 2015 CEMP satisfied the requirements of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	and duration of the mixing zone.	plans, procedures and records relating to the Construction Environmental Management Plan	Refer to Appendix 1 in the October 2015 CEMP.		Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	
24(f)(i)	The CEMP must include: (f) details on any other plant, equipment or activities that involve emissions to the environment, including: (i) a description of the plant, equipment or activities;	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to the Construction Environmental Management Plan	The October 2015 CEMP included details on any other plant, equipment or activities that involve emissions to the environment, including a description of the plant, equipment and activities. Refer to Section 2.6 in the October 2015 CEMP.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP)	The October 2015 CEMP satisfied the requirements of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable
24(f)(ii)	The CEMP must include: (f) details on any other plant, equipment or activities that involve emissions to the environment, including: (ii) design and operational performance information for plant, equipment or activities; and	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to the	The October 2015 CEMP included details on any other plant, equipment or activities that involve emissions to the environment, including design and operational performance information for plant, equipment and activities. Refer to Section 2 in the October 2015 CEMP.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP)	The October 2015 CEMP satisfied the requirements of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
		Construction Environmental Management Plan				
24(f)(iii)	The CEMP must include: (f) details on any other plant, equipment or activities that involve emissions to the environment, including: (iii) the potential for unforseen or accidental incidents and proposed responses to these incidents.	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to the Construction Environmental Management Plan	The October 2015 CEMP included details on any other plant, equipment or activities that involve emissions to the environment, including the potential for unforeseen or accidental incidents and proposed responses to incidents. Refer to Section 7.2; and Appendix 2 in the October 2015 CEMP.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP)	The October 2015 CEMP satisfied the requirements of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable
24(g)	The CEMP must include: (g) a detailed list of waste streams including their handling, treatment and disposal arrangements;	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to the Construction Environmental	The October 2015 CEMP included a detailed list of waste streams including their handling, treatment and disposal arrangements. Refer to Section 2.6; and Appendix 2, Attachment R in the October 2015 CEMP.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP)	The October 2015 CEMP satisfied the requirements of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
		Management Plan				
24(h)	The CEMP must include: (h) the environmental protection commitments proposed for the activities (including all associated accommodation and recreation activities on the Island) to protect the environmental values under best practice environmental management;	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to the Construction Environmental Management Plan	The October 2015 CEMP included the environmental protection commitments proposed for the activities (including all associated accommodation and recreation activities on the Island) to protect the environmental values under best practice environmental management. Refer to Appendix 2, Section 2.5; Appendix 2, Section 3; Appendix 2, Section 5; and Appendix 2, Section 6 in the October 2015 CEMP.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP)	The October 2015 CEMP satisfied the requirements of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable
24(i)	The CEMP must include: (i) a rehabilitation program for land proposed to be disturbed during construction of all infrastructure (including associated accommodation and recreation activities) on Curtis Island;	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to the Construction Environmental Management Plan	The October 2015 CEMP included a rehabilitation program for land proposed to be disturbed during construction of all infrastructure (including associated accommodation and recreation activities) on Curtis Island. Refer to Section 2.11; Section 5.1; and Appendix 2, Attachment K in the October 2015 CEMP.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP)	The October 2015 CEMP satisfied the requirements of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
24(j)	The CEMP must include: (j) details of a response plan, with appropriate triggers, which will be initiated in response to any significant impacts on the environment from the works.	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to the Construction Environmental Management Plan	The October 2015 CEMP included details of a response plan, with appropriate triggers, which will be initiated in response to any significant impacts on the environment from the works. Refer to Section 5.6; Appendix 2, Section 4; Appendix 2, Attachment F; Appendix 2, Attachment G; Appendix 2, Attachment N; and Appendix 2, Attachment Q in the October 2015 CEMP.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP)	The October 2015 CEMP satisfied the requirements of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable
24(k)	The CEMP must include: (k) identification and characterisation of all wastes and emissions produced by the LNG Facility and its associated support infrastructure including its source, handling, treatment, disposal, or release to the environment.	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to the Construction Environmental Management Plan	The October 2015 CEMP included identification and characterisation of all wastes and emissions produced by the LNG Facility and its associated support infrastructure including its source, handling, treatment, disposal, or release to the environment. Refer to Section 2.6; Appendix 2, Attachment D; and Appendix 2, Attachment R in the October 2015 CEMP.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP)	The October 2015 CEMP satisfied the requirements of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
25.	**Construction and operation environmental management requirements and plans** The CEMP, or a stage of the CEMP must be submitted for the approval of the Minister.	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to the Construction Environmental Management Plan Review relevant correspondence between the proponent and Department and/or Minister	Refer to the evidence for both elements of condition 23. As recorded in the 'Revision History' of the October 2015 CEMP, Santos GLNG submitted successive previous versions of the CEMP to the Department, for approval by the Minister.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP) EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2025, dated 17 November 2025	Based on information in the October 2015 CEMP and the LNG Facility 2025 Annual Return, the Auditor considers that Santos GLNG complied with the requirement of this condition element. However, because this condition element relates to a 'submission' requirement which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable
25.	Commencement of the action to which the staged CEMP relates must not occur without the approval in writing of the Minister of the CEMP.	Audit interview Review the Construction Environmental Management Plan Review management plans, procedures and records relating to the Construction Environmental	For the purpose of this condition, the Auditor interprets this condition reference to "the action" as "construction". Refer to the evidence for both elements of condition 23.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP) Letter dated 21 March 2011 from Department to Santos GLNG with approval of CEMP documentation provided by Santos EPBC Approval No. 2008/4057 Santos GLNG LNG Facility	Based on information in the October 2015 CEMP and the LNG Facility 2025 Annual Return, the Auditor considers that Santos GLNG complied with the requirement of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
		Management Plan		Annual Return 2025, dated 17 November 2025	audit finding for this condition element.	
25.	The approved plan must be implemented.	Audit interview Site inspection Review the Construction Environmental Management Plan Review management plans, procedures and records relating to implementation of the Construction Environmental Management Plan	Practical completion of LNG Train 1 occurred on 1 February 2016. Practical completion of LNG Train 2 occurred on 30 July 2016. Section 1.1 in the October 2015 CEMP described the scope of the plan as follows: "The scope of this plan covers construction (including commissioning) phase of the LNG facility and associated marine facilities up until the point at which practical completion of both Train 1 and Train 2 has been reached and the LNG facility has been handed over from GLNG's EPC Contractor Bechtel to GLNG OPL to operate." The Auditor considers that the October 2015 CEMP ceased to apply at the LNG Facility upon handover of LNG Facility operations from Bechtel to Santos GLNG on 6 October 2016. The August 2015 OEMP applied to the entire LNG Facility from 6 October 2016 onwards.	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP) "Milestones" document (Excel file) screenshot provided by Santos GLNG with respective dates of practical completion for LNG Train 1 (1 February 2016) and LNG Train 2 (30 July 2016)	The Auditor considers that Santos GLNG complied with the requirement of this condition element. However, because this condition element relates to an activity (i.e. construction) which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
26.	**Construction and operation environmental management requirements and plans** Before the commissioning of the first LNG train, an Operational Environmental Management Plan (OEMP) must be prepared.	Audit interview Review the Operational Environmental Management Plan Review management plans, procedures and records relating to the Operational Environmental Management Plan	Refer to the evidence for both elements of condition 23. Table 1-2 in the August 2015 OEMP described the relationship between the OEMP and the then current version of the CEMP (Revision 7, March 2014) as follows: "This OEMP covers the operation of the facility from Practical Completion of Train 1. Concurrent construction and commissioning of Train 2, up until Practical Completion of Train 2 in 2016, and decommissioning of temporary construction facilities are covered by the CEMP." Practical completion of LNG Trains 1 and 2 occurred on 1 February 2016 and 30 July 2016, respectively. From 1 February 2016 until handover of the LNG Facility from Bechtel to Santos GLNG on 6 October 2016, the August 2015 OEMP and the March 2014 CEMP operated concurrently as follows: • The August 2015 OEMP applied to LNG Train 1 operations from 1 February 2016 onwards. • The March 2014 and subsequent versions of the	Operations Environment Management Plan to Address Matters of National Environmental Significance and Environmental Authority Conditions for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-5.1.3-0002, dated 17 August 2015 (August 2015 OEMP) EPBC Approval 2008/4057 Dictionary definition of "Commissioning" "LNG Journal – The World's Leading LNG publication – March 2017" (pages 1 to 4) article titled: "Australian operational focus leads to successful GLNG performance" "Milestones" document (Excel file) screenshot provided by Santos GLNG with dates for LNG Train 1 of 7 August 2015 for "inlet area pressured up" and 24 September 2015 for "make LNG", and corresponding dates of 17 April 2016 and 25 May 2016 for LNG Train 2 Santos ASX Media Release dated 24 September 2015 on Santos website: https://www.santos.com/news/2015-glng-starts-lng-production-on-schedule/	Santos GLNG prepared the OEMP before the commissioning of the first LNG train at the LNG Facility. However, because this condition relates to a 'preparation' requirement which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition.	Not applicable

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Condition Number	Condition Element to be Audited	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
			CEMP continued to apply in relation to construction and commissioning of LNG Train 2 and the subsequent decommissioning of temporary accommodation facilities, until handover of the LNG Facility on 6 October 2016. The August 2015 OEMP cover page records the 'Author' of the plan as a Santos Senior Environmental Adviser, with an accompany date of 20 July 2015. This date precedes the date of commissioning of the first LNG train (see below). Santos GLNG internally 'reviewed' the OEMP on 13 August 2015, and 'approved' the OEMP on 17 August 2015. The Approval Dictionary definition of "Commissioning" is: **Commissioning** means the point at which, following completion of the construction of the first LNG train, it is tested to verify if it functions according to its design objectives or specifications;" The Auditor did not obtain evidence of date(s) of 'testing' of the first LNG train, referred to in the definition of "Commissioning". Evidence of a "commissioning" date (i.e. a point in time) exists in a March 2017 LNG Journal (an			

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			industry publication) article about the GLNG Project, as follows: “With the EPC contract being awarded in January 2011, early work began at the facility in May, 2011. Most of Train 1’s utilities were commissioned by early July 2015 to support pressuring up the inlet pretreatment area with hydrocarbons on 7 August 2015 (initial Start-up).” The above article is consistent with a “Milestones” document provided by Santos GLNG, which recorded 7 August 2015 as the date that the LNG Train 1 “Inlet area [was] pressured up”. The Auditor considers that ‘initial start-up/pressure-up’ which occurred on 7 August 2015, is part of “commissioning” as defined in this Approval. The Auditor noted that a Santos ASX Media Release of 24 September 2015, stated that the GLNG Project started to produce LNG on 24 September 2015. “Commissioning” as defined in this Approval occurred prior to 24 September 2015.			

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
27.	**Construction and operation environmental management requirements and plans** The OEMP must address the matters required to be included in the CEMP while incorporating changes and any additions the proponent believes are necessary to reflect the shift from the construction phase to the operational phase.	Audit interview Review the Operational Environmental Management Plan Review management plans, procedures and records relating to the Operational Environmental Plan and Construction Environmental Management Plan	By letter dated 2 October 2015, the Department approved the August 2015 OEMP. The approval letter noted that Santos GLNG had provided further detail on its rehabilitation program as a component of the OEMP, as required by condition 24(i): “Condition 24 (i) of EPBC Approval 2008/4057 requires Santos GLNG to submit a rehabilitation plan for land disturbed during construction of all infrastructure (including associated accommodation and recreation activities) on Curtis Island. I note that Santos GLNG has submitted further detail on its rehabilitation program as a component of the Operational Environmental Management Plan which is required under conditions 26 - 28 of EPBC Approval 2008/4057.”	Operations Environment Management Plan to Address Matters of National Environmental Significance and Environmental Authority Conditions for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-5.1.3-0002, dated 17 August 2015 (August 2015 OEMP) Letter dated 2 October 2015 from Department to Santos GLNG with approval of the August 2015 OEMP	On 2 October 2015, the Minister approved the August 2015 OEMP as meeting the requirements of conditions 24(i), 26 and 27 of the Approval.	Compliance
28.	**Construction and operation environmental management requirements and plans** The OEMP must be submitted for the approval of the Minister.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	Refer to the evidence for condition 26. According to the LNG Facility 2025 Annual Return (condition 26 compliance note), Santos GLNG submitted the August 2015 OEMP to the Department on 19 August 2015. By letter dated 2 October 2015, the Department approved the	Operations Environment Management Plan to Address Matters of National Environmental Significance and Environmental Authority Conditions for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-5.1.3-0002, dated 17 August 2015 (August 2015 OEMP) EPBC Approval No. 2008/4057 Santos GLNG LNG Facility	On 19 August 2015, Santos GLNG submitted the August 2015 OEMP to the Department, for approval by the Minister. However, because this condition element relates to a ‘submission’ requirement which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that ‘not applicable’ is the most appropriate audit finding for this condition element.	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			August 2015 OEMP. The approval letter stated: "On this basis and as delegate of the Minister for the Environment I have decided to approve the above plan [i.e. the August 2015 OEMP] for the operational phase of the LNG Facility and Marine Facilities projects." The Auditor sighted a draft revised version of the August 2015 OEMP, dated 1 August 2024 and identified as Revision 3. GLNG personnel stated that as of December 2025, the draft revised OEMP: a) is under 'provisional approval'; b) has not (yet) been submitted to the Minister; and c) is not in circulation (i.e. not implemented) at the LNG Facility.	Annual Return 2025, dated 17 November 2025 Draft revised version of the August 2015 OEMP – Operations Environmental Management Plan to Address Matters of National Environmental Significance and Environmental Authority Conditions for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-5-1.3-0002, Revision 3 dated 1 August 2024		
28.	Commissioning of the first LNG train must not occur without the approval in writing of the Minister.	Audit interview Review records relating to commissioning of first LNG train Review relevant correspondence between proponent and Department and/or Minister	Refer to the evidence for condition 26. The Auditor interprets "approval in writing" in this condition element, as approval in writing of the OEMP. Commissioning of the first LNG train occurred on or around 7 August 2015, which precedes the Minister's approval of the August 2015 OEMP on 2 October 2015. The Auditor notes that the October 2015 CEMP included a 'Revision History' on the cover	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP) Operations Environment Management Plan to Address Matters of National Environmental Significance and Environmental Authority Conditions for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-5.1.3-0002,	Based on the Auditor's interpretation of this condition element and evidence that commissioning of the first LNG train at the LNG Facility occurred on or around 7 August 2015, prior to the Minister's approval of the August 2015 OEMP on 2 October 2015, Santos GLNG did not comply with the required timeline (i.e. 'approval' before 'commissioning') in this condition element. However, because this condition element relates to a 'timing' requirement which occurred prior	Not applicable

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			page, which described Revision 7 of the CEMP (dated March 2014) as: “Updated to include commissioning activities conducted prior to completion of construction of first LNG train”. According to the LNG Facility 2014 Annual Return (conditions 23, 24 and 25 compliance note), on 4 August 2014, the Minister approved Revision 7 of the CEMP (dated March 2014) for the construction (including commissioning) phase of the LNG Facility. This CEMP approval date preceded the commissioning date of the first LNG train. However, the Auditor considers that this condition element relates to the approval of the OEMP, and not to a CEMP which does not satisfy the requirements of condition 27.	dated 17 August 2015 (August 2015 OEMP) GLNG Annual Environmental Return 2014 EPBC No 2008/4057 LNG Facility, Doc. No. 3301-GLNG-4-1.3-0019 EPBC Approval 2008/4057 Dictionary definition of “Commissioning” “LNG Journal – The World’s Leading LNG publication – March 2017” (pages 1 to 4) article titled: “Australian operational focus leads to successful GLNG performance” “Milestones” document (Excel file) screenshot provided by Santos GLNG with dates for LNG Train 1 of 7 August 2015 for “inlet area pressured up” and 24 September 2015 for “make LNG”, and corresponding dates of 17 April 2016 and 25 May 2016 for LNG Train 2 Santos ASX Media Release dated 24 September 2015 on Santos website: https://www.santos.com/news/2015-glng-starts-lng-production-on-schedule/	to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that ‘not applicable’ is the most appropriate audit finding for this condition element. **Observation No. 9** – Santos GLNG should review its current internal and contractor workflows, and verify that suitable measures (i.e. hold-points) are in place to prevent a similar ‘timing’ non-compliance in the future.	
28.	The approved plan must be implemented. Note: To avoid doubt, if a condition of another approval held by the proponent requires a Construction Environmental Management Plan	Audit interview Site inspection Review the Operational Environmental	During the audit period, the August 2015 OEMP applied to the LNG Facility. The Minister approved the August 2015 OEMP on 2 October 2015.	Operations Environment Management Plan to Address Matters of National Environmental Significance and Environmental Authority Conditions for the LNG Facility and Marine Facilities, Doc.	The Auditor considers there is sufficient evidence that during the audit period, Santos GLNG has implemented the approved August 2015 OEMP.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	and/or Operational Environmental Management Plan, the proponent may simultaneously meet the relevant requirements of both conditions by submitting a single plan.	Management Plan Review management plans, procedures and records relating to implementation of the Operational Environmental Management Plan	Section 1.2 in the August 2015 OEMP describes the scope and purpose of the OEMP. The August 2015 OEMP applies to "the normal operations of the LNG Facility and associated marine facilities", and was prepared "to address the following conditions: • Conditions 26 and 27 of approval EPBC No. 2008/4057 for the LNG facility on Curtis Island; and • Conditions A9 and A10 of Environmental Authority EPPG00712213 (EA)." The August 2015 OEMP includes 'Operations Environmental Management Sub Plans' relating to: • Air (Table 4-3); • Noise (Table 4-7); • Visual Impact and Light (Table 4-8); • Water (Table 4-11); • Land (Table 4-14); • Biodiversity (Table 4-18); • Waste (Table 5-3); • Weeds and Pests (Table 5-4); and • Decommissioning (Table 7-1). In site inspections conducted on 3rd and 4th December 2025, the Auditor reviewed a selection of operational areas and facilities (refer to Section 3 in this audit	No. 3310-GLNG-5.1.3-0002, dated 17 August 2015 (August 2015 OEMP) Letter dated 2 October 2015 from Department to Santos GLNG with approval of the August 2015 OEMP GLNG DSO Operations Environmental Monitoring Plan, Doc. No. 3310-GLNG-5-1.3-0003, Revision 2 dated 14 July 2023 GLNG DSO Stormwater Management Plan (incorporating Erosion and Sediment Control), Doc. No. 3310-GLNG-5-1.3-0005, Revision 3.0 dated 11 July 2023 Sediment Basin Management Procedure, Doc. No. 3310-GLNG-5-1.3-0008, Revision 2 dated 25 July 2022 DSO GLNG Downstream Operations Biosecurity Management Plan, Doc. No. 3310-GLNG-5-1.3-0004, Revision 2 dated 18 July 2023 GLNG Facility Waste Management Plan, Doc. No. 3310-GLNG-5-1.3-0006, Revision 3 dated 27 July 2022 Flaring Contingency Management Plan, Doc. No. 3310-GLNG-5-1-1.3-0013, Revision 2 dated 21 January 2021	**Observation No. 10** – Santos GLNG should ensure that the next revision of the August 2015 OEMP excludes potentially obsolete content (e.g. relating to a groundwater monitoring program) which based on a current risk assessment, may not apply to the operational phase of the LNG Facility.	

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			report), to assess Santos GLNG's implementation of the August 2015 OEMP. The Auditor observed the LNG Facility to be in a generally tidy, well-maintained condition. For example, the standing water levels in Sediment Basins 2 and 3 (inspected on 3rd December 2025) appeared to be below their respective 'dewatering' thresholds of 1.17 metres and 1.00 metres, as specified in Section 3 of the Sediment Basin Management Procedure. Stormwater diversion drains were relatively free of sediment and vegetation. Weed control was observed as taking place within the GLNG Plant area. In relation to operational activities: • Refer to the evidence for conditions 2(b), (c) and (d), which relate to Section 4.3 (Visual Impact and Light) and Table 4-8 (Visual Impact and Light Sub Plan) in the August 2015 OEMP. The Auditor also sighted a Flaring Contingency Management Plan, which (as stated in Section 8) requires visual recording of flaring events. • Refer to the evidence for conditions 3, 4, 5 and 6, which relate to Section 1.9 (Training and Awareness (Including the GLNG Environmental Code of	GLNG DSO Flare Register (Excel file), created 5 May 2019, last modified 3 December 2025 Water worksheet for water quality sampling of on-site Sediment Basins 1, 2 and 3, date range from 18 November 2025 to 3 December 2025 "Appendix A – Sediment Basin Discharge Assessment (Dewatering Permit)" inclusive of water quality results and GLNG Downstream Laboratory sample reports		

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			Conduct)) in the August 2015 OEMP. • Refer to the following examples of issued Dewatering Permits inclusive of GLNG Laboratory reports, which relate to Section 4.4.2.1 (Stormwater and Wastewater) and Table 4-11 ('Water' Sub Plan) in the August 2015 OEMP: ○ A Dewatering Permit first dated 27 December 2023 for a release from Sediment Basin 1. However, water quality results for sampling on this date were "outside specifications". Further sampling was conducted on 28 December 2023 (results were attached to the Permit). The Permit was 'updated' to 28 December 2023 (issued at 06:57) for a release from Sediment Basin 1, with the release occurring from 08:05 on 28 December 2023 to 12:25 on 30 December 2023; ○ 19 December 2024 (issued at 20:00) for a release from Sediment Basin 1, with the release occurring from 20:21 on 19 December 2024 to			

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			11:30 on 21 December 2024; and ○ 17 January 2025 (issued at 15:00) for a release from Sediment Basin 3, with the release occurring from 15:10 on 17 January 2025 to 10:00 on 19 January 2025. The Auditor notes that some content in the August 2015 OEMP is potentially obsolete as of December 2025. For example, Section 6.8 (Groundwater Monitoring) states that: "A monitoring program will be established and implemented to detect potential impacts to groundwater associated with the operation of the LNG facility." Table 4-11 ('Water' Sub Plan) also refers to the implementation of a groundwater monitoring program: "to monitor for potential groundwater impacts from operation of the LNG Facility." However, the July 2023 GLNG DSO Operations Environmental Monitoring Plan (which Section 9 in the August 2015 OEMP identifies as a subordinate internal document) does not refer to groundwater monitoring.			

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
29.	**Discharge of sewage effluent** Any discharge of treated sewage effluent into the waters surrounding Curtis Island must, at minimum, meet the definition of tertiary treatment as specified in section 135(3) of the *Great Barrier Reef Marine Park Regulations 1983* and be in accord with GBRMPA *Sewage Discharge Policy March 2005*, unless studies required to develop the CEMP under conditions 23 and 24 indicate that more stringent pollutant limits are necessary.	Audit interview Review relevant provisions of Great Barrier Reef Marine Park Regulations and GBRMPA Sewage Discharge Policy Review studies required to develop the Construction Environmental Management Plan	In May 2016, Santos GLNG ceased discharges/releases of treated sewage effluent into the waters surrounding Curtis Island. Water quality exceedances at the EA WW1 release point for treated sewage effluent were last reported in the LNG Facility 2016 Annual Return. The WW1 release point has not been utilised since May 2016. Since May 2016 and during the audit period, all treated sewage effluent was piped to the Gladstone Regional Council treatment facility on the mainland. Section 7.3 (Sewage) in the July 2022 Waste Management Plan describes the current sewage disposal arrangement at the LNG Facility as follows: "Sanitary sewage from facility buildings flows via underground lines to sanitary lift stations which are equipped with spared pumps operating in a duty/standby configuration under level control. Sewage from the sanitary sumps is pumped to the Sanitary Wastewater Pumping System where the collected sewage is pumped to the GRC [Gladstone Regional Council] Wastewater Pipeline for off-site treatment."	Operations Environment Management Plan to Address Matters of National Environmental Significance and Environmental Authority Conditions for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-5.1.3-0002, dated 17 August 2015 (August 2015 OEMP) GLNG Facility Waste Management Plan, Doc. No. 3310-GLNG-5-1.3-0006, Revision 3 dated 27 July 2022	During the audit period, Santos GLNG did not discharge treated sewage effluent into the waters surrounding Curtis Island.	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
30.	**Quarantine Management Plan** Before the commencement of construction of the LNG facility, the proponent must prepare a Quarantine Management Plan (QMP). The objectives of the QMP are to prevent the introduction of non-endemic species on to Curtis Island.	Audit interview Review the Quarantine Management Plan Review management plans, procedures and records relating to quarantine management	The first version of the Quarantine Management Plan issued under this condition, was the "Weed and Plant Pathogen Control Plan" (dated 9 March 2011), approved by the Minister on 21 March 2011. The Weed and Plant Pathogen Control Plan, which was included as Attachment S in the Bechtel 2013 CEMP, records an issue date of 9 March 2011 for Revision C ("SEWPaC comments incorporated; Issued for Permit") which preceded commencement of construction on 27 April 2011. The GLNG – Curtis Island Quarantine Area Operations Manual (QAOM) and Biosecurity Management Plan (BMP) were originally issued on 26 June 2012 (Revision A) and 29 May 2012 (Revision 0), respectively. The Auditor considers that as of December 2025, the 2013 QAOM and 2013 BMP together comprise the current approved QMP.	Construction Environmental Management Plan of LNG Facility (Appendix 2, GLNG Environmental Management Plan, in the October 2015 CEMP), Doc. No. 3310-BTH-3-3.3-6817, Revision 3 dated 5 December 2013 (Bechtel 2013 CEMP) Letter dated 21 March 2011 from Department to Santos GLNG with approval of CEMP documentation provided by Santos, including a staged approval (i.e. limited to the period before any planned direct arrival of international imports) of the "Weed and Plant Pathogen Control Plan", GLNG Doc. No. 3310-BTH-3-3.3-6820, dated 9 March 2011 GLNG – Curtis Island Quarantine Area Operations Manual, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-7064, Revision 2 dated 1 February 2013 (2013 QAOM) GLNG – Curtis Island Biosecurity Management Plan, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-0086, Revision 5 dated 1 February 2013 (2013 BMP)	The Weed and Plant Pathogen Control Plan was prepared (and issued on 9 March 2011, and approved on 21 March 2011) before commencement of construction of the LNG Facility on 27 April 2011.	Compliance
30(a)	The QMP must include measures to: (a) detect pests and weeds, and prevent weed introduction and/or proliferation;	Audit interview Review the Quarantine Management Plan	For the purpose of assessing compliance with conditions 30(a) to 30(h), the Auditor reviewed the 2013 QAOM and 2013 BMP,	GLNG – Curtis Island Quarantine Area Operations Manual, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-	The QMP (comprising the 2013 QAOM and 2013 BMP) satisfies the requirements of this condition element.	Compliance

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
		Review management plans, procedures and records relating to quarantine management	which together comprise the current approved QMP. The QMP includes measures to detect pests and weeds, and prevent weed introduction and/or proliferation. Refer to Section 6.1 (Identification, Traceability and Inspection) in the 2013 QAOM. Refer to Section 8.3 (Site management and inspection regimes) and Section 9 (Operational Procedures) in the 2013 BMP.	3.3-7064, Revision 2 dated 1 February 2013 (2013 QAOM) GLNG – Curtis Island Biosecurity Management Plan, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-0086, Revision 5 dated 1 February 2013 (2013 BMP)		
30(b)	The QMP must include measures to: (b) control and, unless otherwise determined by the relevant State authorities, eradicate detected non-indigenous terrestrial species (including weeds);	Audit interview Review the Quarantine Management Plan Review management plans, procedures and records relating to quarantine management	The QMP includes measures to control and, unless otherwise determined by the relevant State authorities, eradicate detected non-indigenous terrestrial species (including weeds). Refer to Section 4.5 (Isolation) and Section 5.2 (Pest control) in the 2013 QAOM. Refer to Section 8.3 (Site management and inspection regimes) and Section 9 (Operational Procedures) in the 2013 BMP.	GLNG – Curtis Island Quarantine Area Operations Manual, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-7064, Revision 2 dated 1 February 2013 (2013 QAOM) GLNG – Curtis Island Biosecurity Management Plan, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-0086, Revision 5 dated 1 February 2013 (2013 BMP)	The QMP (comprising the 2013 QAOM and 2013 BMP) satisfies the requirements of this condition element.	Compliance
30(c)	The QMP must include measures to: (c) mitigate adverse impacts of any control and eradication actions on indigenous species	Audit interview Review the Quarantine Management Plan	The QMP includes measures to mitigate adverse impacts of any control and eradication actions on indigenous species taken against detected pests and weeds.	GLNG – Curtis Island Quarantine Area Operations Manual, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-7064, Revision 2 dated 1 February 2013 (2013 QAOM)	The QMP (comprising the 2013 QAOM and 2013 BMP) satisfies the requirements of this condition element.	Compliance

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	taken against detected pests and weeds;	~~Review management plans, procedures and records relating to quarantine management~~	Refer to Section 9 (Operational Procedures) in the 2013 BMP.	GLNG – Curtis Island Biosecurity Management Plan, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-0086, Revision 5 dated 1 February 2013 (2013 BMP)		
30(d)	The QMP must include measures to: (d) assess risk, manage supply chains, and manage and inspect vessels;	Audit interview Review the Quarantine Management Plan Review management plans, procedures and records relating to quarantine management	The QMP includes measures to assess risk, manage supply chains, and manage and inspect vessels. Refer to Section 5.4 (Imported Goods Pathway – Arrival of Shipment at the MOF QA) in the 2013 QAOM. Refer to Section 9.1 (Imported Cargo Pathway) and Section 9.2 (Inspections) in the 2013 BMP.	GLNG – Curtis Island Quarantine Area Operations Manual, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-7064, Revision 2 dated 1 February 2013 (2013 QAOM) GLNG – Curtis Island Biosecurity Management Plan, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-0086, Revision 5 dated 1 February 2013 (2013 BMP)	The QMP (comprising the 2013 QAOM and 2013 BMP) satisfies the requirements of this condition element.	Compliance
30(e)	The QMP must include measures to: (e) mitigate any pest or weed impacts;	Audit interview Review the Quarantine Management Plan Review management plans, procedures and records relating to quarantine management	The QMP includes measures to mitigate any pest or weed impacts. Refer to Section 9 (Operational Procedures) in the 2013 BMP.	GLNG – Curtis Island Quarantine Area Operations Manual, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-7064, Revision 2 dated 1 February 2013 (2013 QAOM) GLNG – Curtis Island Biosecurity Management Plan, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-0086, Revision 5 dated 1 February 2013 (2013 BMP)	The QMP (comprising the 2013 QAOM and 2013 BMP) satisfies the requirements of this condition element.	Compliance

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
30(f)	The QMP must include measures to: (f) report and record any quarantine incidents;	Audit interview Review the Quarantine Management Plan Review management plans, procedures and records relating to quarantine management	The QMP includes measures to report and record any quarantine incidents. Refer to Section 4.6 (Access & Security), Section 5.1 (Biosecurity Related Spills) and Section 6.5 (Contingency) in the 2013 QAOM. Refer to Section 4 (Management/Responsibilities) and Section 13 (Reporting & Records/Documentation) in the 2013 BMP.	GLNG – Curtis Island Quarantine Area Operations Manual, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-7064, Revision 2 dated 1 February 2013 (2013 QAOM) GLNG – Curtis Island Biosecurity Management Plan, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-0086, Revision 5 dated 1 February 2013 (2013 BMP)	The QMP (comprising the 2013 QAOM and 2013 BMP) satisfies the requirements of this condition element.	Compliance
30(g)	The QMP must include measures to: (g) identify performance standards to be achieved by the QMP; and	Audit interview Review the Quarantine Management Plan Review management plans, procedures and records relating to quarantine management	The QMP includes measures to identify performance standards to be achieved by the QMP. Refer to Section 7.6 (Environmental Performance Indicators) in the 2013 BMP.	GLNG – Curtis Island Quarantine Area Operations Manual, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-7064, Revision 2 dated 1 February 2013 (2013 QAOM) GLNG – Curtis Island Biosecurity Management Plan, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-0086, Revision 5 dated 1 February 2013 (2013 BMP)	The QMP (comprising the 2013 QAOM and 2013 BMP) satisfies the requirements of this condition element.	Compliance
30(h)	The QMP must include measures to: (h) undertake a review of the QMP and identify the need for any further studies. Note: To avoid doubt, the QMP may be submitted in stages, for example to cover the period prior to any planned direct arrival at the MOF of	Audit interview Review the Quarantine Management Plan Review management plans, procedures and records relating	The QMP includes measures to undertake a review of the QMP and identify the need for any other studies. Refer to Section 12 (Auditing) in the 2013 BMP.	GLNG – Curtis Island Quarantine Area Operations Manual, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-7064, Revision 2 dated 1 February 2013 (2013 QAOM) GLNG – Curtis Island Biosecurity Management Plan, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-0086,	The QMP (comprising the 2013 QAOM and 2013 BMP) satisfies the requirements of this condition element.	Compliance

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	international imports, and after this time.	to quarantine management		Revision 5 dated 1 February 2013 (2013 BMP)		
31.	**Quarantine Management Plan** The QMP must be submitted for the approval of the Minister.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	By letter dated 21 March 2011, the Department approved the Weed and Plant Pathogen Control Plan (Revision C dated 9 March 2011), "as a staged Quarantine Management Plan (QMP), to meet the requirements of conditions 30 and 31 of EPBC 2008/4057." In relation to the 2013 QAOM and 2013 BMP, the LNG Facility 2013 Annual Return (conditions 30 and 31 compliance note) stated that: "GLNG submitted the 'GLNG – Curtis Island Quarantine Area Operations Manual' and 'GLNG – Curtis Island Biosecurity Management Plan' to the Department for approval on 4 February 2013. The Department approved the plans on 6 February 2013." During the audit period, Santos GLNG prepared and issued an updated "DSO GLNG Downstream Operations Biosecurity Management Plan", Doc. No. 3310-GLNG-5-1.3-0004, Revision 2 dated 18 July 2023. As of December 2025, this updated plan has not been submitted to the Minister for approval.	Weed and Plant Pathogen Control Plan, prepared by Bechtel Australia Pty Ltd, GLNG Doc, No. 3310-BTH-3-3.3-6838, Revision 4 dated 5 December 2013 (Attachment S to Bechtel 2013 CEMP) Letter dated 21 March 2011 from Department to Santos GLNG with approval of CEMP documentation provided by Santos, including a staged approval (i.e. limited to the period before any planned direct arrival of international imports) of the "Weed and Plant Pathogen Control Plan", GLNG Doc. No. 3310-BTH-3-3.3-6820, dated 9 March 2011 GLNG – Curtis Island Quarantine Area Operations Manual, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-7064, Revision 2 dated 1 February 2013 (2013 QAOM) GLNG – Curtis Island Biosecurity Management Plan, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-0086, Revision 5 dated 1 February 2013 (2013 BMP) GLNG Annual Environmental Return 2013 EPBC No 2008/4057 LNG Facility, Doc. No. 3301-GLNG-4-1.3-0064	Santos GLNG submitted the Weed and Pathogen Control Plan (Revision C dated 9 March 2011) for the approval of the Minister, as evidenced by the Department approval letter of 21 March 2011. The Minister approved the current QMP (i.e. 2013 QAOM and 2013 BMP) on 6 February 2013.	Compliance

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
				DSO GLNG Downstream Operations Biosecurity Management Plan, Doc. No. 3310-GLNG-5-1.3-0004, Revision 2 dated 18 July 2023		
31.	Commencement must not occur without the approval in writing of the Minister.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	The Auditor interprets the “approval in writing” wording in this condition element, as approval in writing of the QMP. By letter dated 21 March 2011, the Department approved the Weed and Plant Pathogen Control Plan (Revision C dated 9 March 2011), “as a staged Quarantine Management Plan (QMP), to meet the requirements of conditions 30 and 31 of EPBC 2008/4057.” Approval was limited to the period before the planned arrival of international imports. In 2013, the Weed and Plant Pathogen Control Plan was replaced by the Quarantine Area Operations Manual and Biosecurity Management Plan. The LNG Facility 2013 Annual Return noted that: “GLNG submitted the ‘GLNG – Curtis Island Quarantine Area Operations Manual’ and ‘GLNG – Curtis Island Biosecurity Management Plan’ to the Department for approval on 4 February 2013. The Department approved the plans on 6 February 2013.”	Letter dated 21 March 2011 from Department to Santos GLNG with approval of CEMP documentation provided by Santos, including a staged approval (i.e. limited to the period before any planned direct arrival of international imports) of the “Weed and Plant Pathogen Control Plan”, GLNG Doc. No. 3310-BTH-3-3.3-6820, dated 9 March 2011 GLNG – Curtis Island Quarantine Area Operations Manual, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-7064, Revision 2 dated 1 February 2013 GLNG – Curtis Island Biosecurity Management Plan, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-0086, Revision 5 dated 1 February 2013 (2013 BMP) GLNG Annual Environmental Return 2013 EPBC No 2008/4057 LNG Facility, Doc. No. 3301-GLNG-4-1.3-0064	Construction of the LNG Facility commenced on 27 April 2011, after the Minister’s approval of the Weed and Plant Pathogen Control Plan (Revision C dated 9 March 2011) on 21 March 2011.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
31.	The approved Plan must be implemented. Note. To avoid doubt, if a condition of another approval held by the proponent requires a Quarantine Management Plan, the proponent may simultaneously meet the relevant requirements of both conditions by submitting a single plan. The plan, or components thereof, may also be prepared and implemented in consultation with the Gladstone Ports Corporation or other bodies.	Audit interview Site inspection Review the Quarantine Management Plan Review management plans, procedures and records relating to implementation of the Quarantine Management Plan	The Auditor notes that the LNG Facility 2025 Annual Return (conditions 30 and 31 compliance note) stated: "The Department of Agriculture and Water Resources undertook a first point of entry assessment through 2018-2019 and confirmed on 29 March 2019 that GLNG demonstrated full compliance with all biosecurity standards." Refer to the evidence for conditions 3 and 4, for details of biosecurity measures which are implemented for LNG Facility operations. These measures appear to be consistent with the July 2023 Biosecurity Management Plan; for example, section 6 of the plan states that: "GLNG marine transport contractor (Sealink) will maintain records of vehicle/ plant movements and is responsible for confirming that that all vehicles/ plant being moved to or from site holds a current weed hygiene declaration." Despite the above evidence, for the purpose of assessing compliance with this condition element, the Auditor was required to consider Santos GLNG's implementation of the current	GLNG – Curtis Island Quarantine Area Operations Manual, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-7064, Revision 2 dated 1 February 2013 (2013 QAOM) GLNG – Curtis Island Biosecurity Management Plan, prepared by Bechtel Australia Pty Ltd, GLNG Doc. No. 3310-BTH-3-3.3-0086, Revision 5 dated 1 February 2013 (2013 BMP) DSO GLNG Downstream Operations Biosecurity Management Plan, Doc. No. 3310-GLNG-5-1.3-0004, Revision 2 dated 18 July 2023 Sealink 'Booking Information Package' (8 pages) with client and legislative requirements for passage Completed 2025 MOT (Marine Operations Terminal) Vehicle Inspection Register records dated 8 August, 12 August, 17 August, 4 September, 19 September, 30 September, 31 October, 4 November, 7 November, 10 November, and 19 November Santos Barge Booking Request form (Excel file) 'Weed hygiene declaration' form (issued by the Queensland Government, form PR10_4996) which accompanies the Santos Barge Booking Request form	Based on information in the August 2015 OEMP and the signed contract between Santos GLNG and Gidarjil for vegetation and weed management services, the Auditor considers that Santos GLNG has implemented relevant aspects of the approved QMP (i.e. the 2013 QAOM and 2013 BMP) which continued to apply during the operational phase of the LNG Facility. **Observation No. 11** – Santos GLNG should submit for the Minister's approval, a revised Biosecurity Management Plan (to be defined as and satisfy the requirements in conditions 30(a) to 30(h) for a Quarantine Management Plan) which reflects the current operational phase of the LNG Facility.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			approved QMP; i.e. the 2013 QAOM and 2013 BMP. Although the scope of the 2013 QAOM (Section 2) and 2013 BMP (Section 3) is not limited to the construction phase of the LNG Facility (the documents are stated to be 'evergreen'), the documents focus on the construction phase and on the responsibilities of Bechtel (the Engineering, Procurement, Construction and Commissioning Contractor). The on-site quarantine facilities described in the 2013 QAOM were removed from the LNG Facility site prior to the audit period. GLNG personnel stated that these facilities were no longer required because after removal of these quarantine facilities, no direct international imports of goods to the LNG Facility occurred. All goods imported from overseas first arrive on the Australian mainland. The 2013 QAOM and 2013 BMP, excluding quarantine-related requirements, continue to apply during the operational phase of the LNG Facility. The continuing status of the documents is acknowledged in Section 1.3, Table 1-4 of the August 2015 OEMP, which refers to the 2013 QAOM and 2013 BMP as supporting documents.	Goods and Services Blanket Purchase Contract (No. 4904, signed but undated) for weed and vegetation management services (including a detailed scope of services in Schedule 2), between GLNG and Gidarjil Development Corporation		

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			Evidence of implementation of the 2013 QAOM and 2013 BMP exists in Section 5.2 in the August 2015 OEMP, which describes 'weed and pest management' measures. Examples of these measures are: a) an on-site vehicle washdown facility (which the Auditor sighted) for cleaning site vehicles that may enter or leave areas where weeds may be present; and b) a regular weed eradication program to control any weeds found. In relation to operational controls for weed eradication, the Auditor sighted a current signed contract between GLNG and contractor, Gidarjil, for on-site weed and vegetation management services. Schedule 2 (Scope of Services) in the contract includes the following services, which the Auditor considers to be consistent with relevant requirements in conditions 30(a), 30(b), 30(c) and 30(e) of the Approval: "(i) Ensure no herbicide enters the drain network (unless authorised by the Company); (j) Control all invasive plants, including Weeds of National Significance (WoNS) as well as invasive species on the site (e.g. Rubber vine, Parthenium, Giant Rats tail Grass, Lantana etc); (k) Use of the latest recommended accepted			

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			herbicidal treatment methods from Biosecurity Queensland to control specific weeds where the location of the weed is not within a drain. (l) All WoNS and invasive plants identified onsite shall be recorded and GPS located with details provided to the Company."			
32(a)	**Environmental Management Plan – Water Mouse (*Xeromys myoides*)** To protect the Water Mouse (*Xeromys myoides*), the proponent must submit to the Minister an Environmental Management Plan (the Water Mouse Environmental Management Plan) which must include: (a) results of a pre-clearance survey undertaken at the appropriate time and season for the species;	Audit interview Review the Water Mouse Environmental Management Plan Review management plans, procedures and records relating to the Water Mouse (*Xeromys myoides*) Review relevant records of pre-clearance surveys Review relevant correspondence between proponent and Department and/or Minister	Table 1-4 (Supporting Documentation) in the August 2015 OEMP refers to the May 2012 Water Mouse Survey as the relevant document which complies with conditions 32 and 33 of the Approval. The May 2012 Water Mouse Survey refers to the "BAAM (2011a). 'Water Mouse Survey and Habitat Assessment, Santos GLNG, Curtis Island LNG Facility.' Report prepared for URS Australia." By letter dated 21 March 2011, the Department approved the February 2011 Water Mouse Survey and Habitat Assessment, inclusive of Appendix 3, Water Mouse Habitat Management Plan. The May 2012 Water Mouse Survey report, as published on the Santos GLNG website (note: the date of Minister's approval of the May 2012 Water Mouse Survey report was not verified) and which replaced the February 2011 Water	Operations Environment Management Plan to Address Matters of National Environmental Significance and Environmental Authority Conditions for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-5.1.3-0002, dated 17 August 2015 (August 2015 OEMP) GLNG Project Curtis Island LNG Facility – Water Mouse Survey and Habitat Assessment, Report prepared by Biodiversity and Management Australia Pty Ltd (BAAM) for URS Australia, File No. 0154-007, dated 9 February 2011 Letter dated 11 February 2011 from Santos GLNG to Department with attached "GLNG Curtis Island Facility: Water Mouse Survey and Habitat Assessment" for approval by the Minister under conditions 32 and 33 Letter dated 21 March 2011 from Department to Santos GLNG with approval of CEMP documentation	In relation to the February 2011 GLNG Curtis Island Facility: Water Mouse Survey and Habitat Assessment report, the Auditor considers that the Department's approval letter of 21 March 2011 is sufficient evidence that Santos GLNG complied with condition 32(a) at the relevant time.	Compliance

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			Mouse Survey and Habitat Assessment, does not include a Water Mouse Environmental Management Plan. Instead, Section 6.0 of the May 2012 Water Mouse Survey report stated that: "It is understood that a Water Mouse Management Plan is already in place for the GLNG Project area." The relevant Water Mouse Environmental Management Plan for the purpose of conditions 32 and 33, is the Water Mouse Habitat Management Plan which forms Appendix 3 in the February 2011 GLNG Curtis Island Facility: Water Mouse Survey and Habitat Assessment, which the Department approved on 21 March 2011.	provided by Santos, including the "Water Mouse Survey and Habitat Assessment (including Appendix 3, Water Mouse Habitat Management Plan)" dated 11 February 2011 GLNG Facility, Curtis Island – Water Mouse Survey, Report prepared by Biodiversity Assessment and Management Australia Pty Ltd (BAAM) for URS Australia, File No. 0154-008, Version 0 dated 23 May 2012		
32(b)	To protect the Water Mouse (*Xeromys myoides*), the proponent must submit to the Minister an Environmental Management Plan (the Water Mouse Environmental Management Plan) which must include: (b) a map of the location of potential habitat for the Water Mouse in proximity to marine facilities;	Audit interview Review the Water Mouse Environmental Management Plan Review management plans, procedures and records relating to the Water Mouse	The May 2012 Water Mouse Survey report includes: • Figure 1.1 (Locality of the Survey Sites), Google Earth Pro image dated 11 March 2011. • Figure 1.2 (GLNG Infrastructure Footprint Overlayed on Northern Water Mouse Habitat Survey Area, with Trapping Line Indicated), Google Earth Pro image dated 7 December 2011 (Trap Line 1).	GLNG Project Curtis Island LNG Facility – Water Mouse Survey and Habitat Assessment, Report prepared by Biodiversity and Management Australia Pty Ltd (BAAM) for URS Australia, File No. 0154-007, dated 9 February 2011 Letter dated 11 February 2011 from Santos GLNG to Department with attached "GLNG Curtis Island Facility: Water Mouse Survey and Habitat Assessment" for approval	In relation to the February 2011 GLNG Curtis Island Facility: Water Mouse Survey and Habitat Assessment report, the Auditor considers that the Department's approval letter of 21 March 2011 is sufficient evidence that Santos GLNG complied with condition 32(b) at the relevant time.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
		(*Xeromys myoides*) Review relevant mapping records Review relevant correspondence between proponent and Department and/or Minister	• Figure 1.3 (GLNG Infrastructure Footprint Overlayed on Northern Water Mouse Habitat Survey Area, with Trapping Line Indicated), Google Earth Pro image dated 7 December 2011 (Trap Line 2). The February 2011 GLNG Curtis Island Facility: Water Mouse Survey and Habitat Assessment, also includes earlier versions (images dated 31 May 2007) of the above Figures 1.1 and 1.2.	by the Minister under conditions 32 and 33 Letter dated 21 March 2011 from Department to Santos GLNG with approval of CEMP documentation provided by Santos, including the "Water Mouse Survey and Habitat Assessment (including Appendix 3, Water Mouse Habitat Management Plan)" dated 11 February 2011 GLNG Facility, Curtis Island – Water Mouse Survey, Report prepared by Biodiversity Assessment and Management Australia Pty Ltd (BAAM) for URS Australia, File No. 0154-008, Version 0 dated 23 May 2012		
32(c)	To protect the Water Mouse (*Xeromys myoides*), the proponent must submit to the Minister an Environmental Management Plan (the Water Mouse Environmental Management Plan) which must include: (c) measures that will be employed to avoid impacts on the Water Mouse or its potential habitat; and	Audit interview Review the Water Mouse Environmental Management Plan Review management plans, procedures and records relating to the Water Mouse (*Xeromys myoides*) Review relevant correspondence between	GLNG personnel stated that no sightings of water mouse occurred within or around the LNG Facility during the audit period. The Auditor notes that this condition element is based on the existence of: a) water mouse; and/or b) potential water mouse habitat, within and around the LNG Facility. By letter dated 21 March 2011, the Department approved the February 2011 Water Mouse Survey and Habitat Assessment report, including the Water Mouse Habitat Management Plan in Appendix 3.	Operations Environment Management Plan to Address Matters of National Environmental Significance and Environmental Authority Conditions for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-5.1.3-0002, dated 17 August 2015 (August 2015 OEMP) Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP) GLNG Project Curtis Island LNG Facility – Water Mouse Survey	In relation to the February 2011 GLNG Curtis Island Facility: Water Mouse Survey and Habitat Assessment report, the Auditor considers that the Department's approval letter of 21 March 2011 is sufficient evidence that Santos GLNG complied with condition 32(c) at the relevant time. **Observation No. 12** – Santos GLNG should incorporate relevant water mouse habitat mitigation measures into a future revision of the OEMP; for example, via inclusion of a Water Mouse Habitat Management Sub-Plan in the relevant 'Water Mouse' section of a revised OEMP.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
		proponent and Department and/or Minister	The stated 'objectives and targets' of the February 2011 Water Mouse Habitat Management Plan are: "Maintain the current extent, quality and hydrology of identified potential foraging and nesting habitat for Water Mouse in China Bay." The eight 'tasks/actions' defined in the February 2011 Water Mouse Habitat Management Plan (with only minor wording changes) are included in Section 5.9 of the October 2015 CEMP and described as mitigation measures. The Auditor considers that the following 'tasks/actions' in the February 2011 Water Mouse Habitat Management Plan apply to the operational phase of the LNG Facility: "4. Ensure all lighting used during clearing, construction and operational activities is directed away from and is positioned as far as is practicable away from all intertidal habitat. 5. Ensure night-time noise impacts to intertidal habitat resulting from clearing, construction and operational activities is minimised as much as is practicable, with a focus on avoiding night-	and Habitat Assessment, Report prepared by Biodiversity and Management Australia Pty Ltd (BAAM) for URS Australia, File No. 0154-007, dated 9 February 2011 Letter dated 11 February 2011 from Santos GLNG to Department with attached "GLNG Curtis Island Facility: Water Mouse Survey and Habitat Assessment" for approval by the Minister under conditions 32 and 33 Letter dated 21 March 2011 from Department to Santos GLNG with approval of CEMP documentation provided by Santos, including the "Water Mouse Survey and Habitat Assessment (including Appendix 3, Water Mouse Habitat Management Plan)" dated 11 February 2011 GLNG Facility, Curtis Island – Water Mouse Survey, Report prepared by Biodiversity Assessment and Management Australia Pty Ltd (BAAM) for URS Australia, File No. 0154-008, Version 0 dated 23 May 2012		

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			time noise disturbance to identified potential Water Mouse habitat. … 7. Institute measures consistent with the site Surface Water Management Plan to maintain current freshwater hydrology of mangrove habitat in China Bay (i.e. no increase in stormwater run-off or sedimentation resulting from freshwater inflows that may reduce salinity and Water Mouse prey abundance)." Unlike the October 2015 CEMP, the August 2015 OEMP does not include or refer to any specific measures to avoid any adverse impacts to the Water Mouse or its potential habitat.			
32(d)	To protect the Water Mouse (*Xeromys myoides*), the proponent must submit to the Minister an Environmental Management Plan (the Water Mouse Environmental Management Plan) which must include: (d) if impacts on the Water Mouse or its potential habitat are unavoidable, propose offsets to compensate for the impacts.	Audit interview Review the Water Mouse Environmental Management Plan Review management plans, procedures and records relating to the Water Mouse	Section 7.0 in the February 2011 Water Mouse Survey and Habitat Assessment report noted that: "The proposed GLNG infrastructure disturbance footprint does not directly impact upon any potential Water Mouse foraging or nesting habitat identified in this study (**Figure 1.2**)." Section 6.0 in the May 2012 Water Mouse Survey report noted that:	GLNG Project Curtis Island LNG Facility – Water Mouse Survey and Habitat Assessment, Report prepared by Biodiversity and Management Australia Pty Ltd (BAAM) for URS Australia, File No. 0154-007, dated 9 February 2011 Letter dated 11 February 2011 from Santos GLNG to Department with attached "GLNG Curtis Island Facility: Water Mouse Survey and Habitat Assessment" for approval	In relation to the February 2011 GLNG Curtis Island Facility: Water Mouse Survey and Habitat Assessment report, the Auditor considers that the Department's approval letter of 21 March 2011 is sufficient evidence that Santos GLNG complied with condition 32(d) at the relevant time.	Compliance

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	Note: To avoid doubt, if a condition of another approval held by the proponent requires a Water Mouse Environmental Management Plan, the proponent may simultaneously meet the relevant requirements of both conditions by submitting a single plan. The plan may also be prepared in consultation with the Gladstone Ports Corporation in accordance with conditions imposed for the Gladstone Western Basin Dredging and Disposal Project (EPBC 2009/4904).	(*Xeromys myoides*) Review relevant correspondence between proponent and Department and/or Minister	"The proposed extension to the GLNG infrastructure disturbance footprint does not directly impact upon any moderate or high potential Water Mouse foraging or nesting habitat identified in this study." Neither of the above Survey reports proposed offsets to compensate for impacts to water mouse or their potential habitat. Table 8 (Impacts of the projects on environmental values to be offset through the Monte Christo Offset Proposal) in the 2013 MCOP, recorded no impact on the 'Water mouse (*Xeromys myoides*)' environmental value from the GLNG LNG Facility. Hence, no offset was required for the GLNG LNG Facility in relation to the water mouse.	by the Minister under conditions 32 and 33 Letter dated 21 March 2011 from Department to Santos GLNG with approval of CEMP documentation provided by Santos, including the "Water Mouse Survey and Habitat Assessment (including Appendix 3, Water Mouse Habitat Management Plan)" dated 11 February 2011 GLNG Facility, Curtis Island – Water Mouse Survey, Report prepared by Biodiversity Assessment and Management Australia Pty Ltd (BAAM) for URS Australia, File No. 0154-008, Version 0 dated 23 May 2012 Monte Christo Offset Proposal, prepared for: Santos GLNG, Australia Pacific LNG and Queensland Curtis LNG; prepared by Ecofund Qld Pty Ltd, dated 8 August 2013, Doc. No. 3301-GLNG-4-1.3-0049 (2013 MCOP)		
33.	The Water Mouse Environmental Management Plan must be submitted for the approval of the Minister within six months of this approval.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	The LNG Facility 2011 Annual Return noted that: "The 'GLNG Curtis Island Facility: Water Mouse Survey and Habitat Assessment' was submitted to the Department on 11/02/2011(file reference: 2008/4057-LETTER-002- A). The Department approved the plan on 21/03/2011 (file reference: 2011/00888)."	GLNG Project Curtis Island LNG Facility – Water Mouse Survey and Habitat Assessment, Report prepared by Biodiversity and Management Australia Pty Ltd (BAAM) for URS Australia, File No. 0154-007, dated 9 February 2011 Letter dated 11 February 2011 from Santos GLNG to Department with attached "GLNG Curtis Island Facility: Water Mouse Survey and	Santos GLNG submitted the Water Mouse Habitat Management Plan (Appendix 3 in the February 2011 Water Mouse Survey and Habitat Assessment report) to the Minister within six months of 22 October 2010. However, because this condition element relates to a 'submission' requirement which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			By letter dated 11 February 2011 (i.e. within six months of 22 October 2010), Santos GLNG submitted the "GLNG Curtis Island Facility: Water Mouse Survey and Habitat Assessment" for approval by the Minister under conditions 32 and 33.	Habitat Assessment" for approval by the Minister under conditions 32 and 33 Letter dated 21 March 2011 from Department to Santos GLNG with approval of CEMP documentation provided by Santos, including the "Water Mouse Survey and Habitat Assessment (including Appendix 3, Water Mouse Habitat Management Plan)" dated 11 February 2011 GLNG Annual Environmental Return 2011 EPBC No 2008/4057 LNG Facility, Doc. No. 3310-GLNG-4-1.3-0008	considers that 'not applicable' is the most appropriate audit finding for this condition element.	
33.	The approved plan must be implemented.	Audit interview Site inspection Review the Water Mouse Environmental Management Plan Review management plans, procedures and records relating to implementation of the Water Mouse Environmental Management Plan	The Water Mouse Habitat Management Plan in Appendix 3 of the February 2011 Water Mouse Survey and Habitat Assessment report includes eight 'tasks/actions' (refer to the evidence for condition 32(c)), and six 'frequency/deadlines' tasks. GLNG personnel stated that the 'frequency/deadlines' tasks in the Water Mouse Habitat Management Plan should be interpreted as being limited to construction/disturbance activities only, as defined by the first task in the list, which states: "Onsite Environmental Supervisor to be appointed prior to the commencing of construction/disturbance	Construction Environmental Management Plan to Address Matters of National Environmental Significance for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-4-1.3-0001, Revision 9 dated October 2015 (October 2015 CEMP) GLNG Project Curtis Island LNG Facility – Water Mouse Survey and Habitat Assessment, Report prepared by Biodiversity and Management Australia Pty Ltd (BAAM) for URS Australia, File No. 0154-007, dated 9 February 2011 Letter dated 11 February 2011 from Santos GLNG to Department with attached "GLNG Curtis Island Facility: Water Mouse Survey and Habitat Assessment" for approval	During the audit period, Santos implemented a street lighting upgrade at the LNG Facility, which was consistent with 'task/action' item 4 in the approved February 2011 Water Mouse Habitat Management Plan. **Observation No. 13** – At a suitable time during the operational phase of the LNG Facility, Santos GLNG could commission a new water mouse survey and water mouse habitat assessment to verify whether the outcomes identified in the May 2012 Water Mouse Survey report still remain valid.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			activities within GLNG Project area." GLNG personnel stated that during the audit period, no construction/disturbance activities occurred at the LNG Facility. Refer to the evidence for condition 2(c). As referred to in the evidence for condition 2(d), during the audit period, Santos GLNG completed one lighting-related project (MOC-GL-020963) to upgrade street lighting across the entire LNG Facility site from HPS (high pressure sodium) to LED streetlights. The LED streetlights were assessed in the MOC document (Section 3.1) as having less light spill than the HPS streetlights. The Auditor considers that the above lighting-related project is consistent with item 4 (i.e. "Ensure all lighting used during clearing, construction and operational activities is directed away from and is positioned as far as is practicable away from all intertidal habitat.") in the 'tasks/action' list (refer to the evidence for condition 32(c)) of the Water Mouse Habitat Management Plan. The Auditor considers that inclusion of the February 2011 "GLNG Curtis Island Facility: Water Mouse Survey and Habitat Assessment" (inclusive of	by the Minister under conditions 32 and 33 Letter dated 21 March 2011 from Department to Santos GLNG with approval of CEMP documentation provided by Santos, including the "Water Mouse Survey and Habitat Assessment (including Appendix 3, Water Mouse Habitat Management Plan)" dated 11 February 2011 GLNG Facility, Curtis Island – Water Mouse Survey, Report prepared by Biodiversity Assessment and Management Australia Pty Ltd (BAAM) for URS Australia, File No. 0154-008, Version 0 dated 23 May 2012		

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			Appendix 3, Water Mouse Habitat Management Plan), as a supporting document in Section 1.3, Table 1-4 of the August 2015 OEMP, is evidence that the approved plan continues to apply during the operational phase of the LNG Facility. Refer to the evidence for condition 32(c) for examples of relevant 'tasks/actions' which the Auditor considers to continue to apply. During the audit period, no water mouse surveys or water mouse habitat assessments were conducted at the LNG Facility. The most recent (May 2012) Water Mouse Survey Report indicated that 'potential' foraging (mangrove) habitat for water mouse continued to exist at the study sites. Section 5.0 in the May 2012 Water Mouse Survey report noted that: "As it is understood the proposed footprint for construction activities (**Figures 1.2** and **1.3**) will largely impact mangrove habitat which is considered to be of low foraging/nesting potential for Water Mouse (i.e. scattered mangroves on rocky substrate). Nonetheless, the remaining extant mangrove communities on the study sites provide			

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			potential foraging habitat and may provide future habitat or linkages between higher value habitats in the local landscape."			
34(a)	**Long-term Marine Turtle Management Plan** Within six months of this approval, the proponent must (a) contribute an initial amount of $150 000 towards preparation of a long term marine turtle management plan; and	Audit interview Review the Long-term Marine Turtle Management Plan Review records of financial contributions	The LNG Facility 2011 Annual Return noted that on 20 April 2011, GLNG requested a six-month extension of time for compliance with this condition. The Department approved an extension of time until 22 October 2011. The Auditor did not obtain direct evidence of payment of the initial amount of $150,000. However, the LNG Facility 2025 Annual Return noted that: "GLNG committed $150,000 towards the preparation and subsequent implementation of the Long-Term Turtle Management Plan (LTTMP). Document reference number: 3301-GLNG-4-1.3-0049."	GLNG Annual Environmental Return 2011 EPBC No 2008/4057 LNG Facility, Doc. No. 3310-GLNG-4-1.3-0008 EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2025, dated 17 November 2025	Based on information in the LNG Facility 2011 and 2025 Annual Returns, the Auditor considers that Santos GLNG complied with this condition element. However, because this condition element relates to a 'contribution' deadline which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable
34(b)	Within six months of this approval, the proponent must (b) participate in industry wide discussions with the Gladstone Ports Corporation and other port users (including LNG proponents) with a view to establishing a long term marine turtle management plan and future	Audit interview Review the Long-term Marine Turtle Management Plan Review records of participation in industry wide discussions with Gladstone Ports	The LNG Facility 2011 Annual Return noted that on 20 April 2011, GLNG requested a six-month extension of time for compliance with this condition. The Department approved an extension of time until 22 October 2011. The LNG Facility 2011 Annual Return also noted that:	GLNG Annual Environmental Return 2011 EPBC No 2008/4057 LNG Facility, Doc. No. 3310-GLNG-4-1.3-0008	Based on information in the LNG Facility 2011 Annual Return, the Auditor considers that Santos GLNG complied with this condition element. However, because this condition element relates to a 'participation' deadline which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	funding requirements for the plan.	Corporation and other port users relating to marine turtle management	"GLNG has consulted with the Gladstone Ports Corporation (GPC) and other LNG proponents (APLNG and QGC) and other port users on several occasions regarding the development of the long term marine turtle management plan (LTMTMP)." The industry-wide discussions did not result in an industry-wide agreement to establish a LTTMP. Hence, the three LNG proponents (QGC, APLNG and GLNG) decided to jointly prepare their own LTTMP.		the most appropriate audit finding for this condition element.	
35.	**Long-term Marine Turtle Management Plan** If terms of the long term marine turtle management Plan cannot be agreed on an industry wide basis (within the Port of Gladstone) within six months of this approval, then the proponent must prepare a long term marine turtle management plan in consultation with other LNG proponents who have confirmed an intention to establish an LNG Facility on Curtis Island.	Audit interview Review the Long-term Marine Turtle Management Plan Review management plans, procedures and records relating to marine turtles Review records of consultation with other Curtis Island LNG proponents	The LTTMP (original and subsequent revisions) was prepared on behalf of the three LNG proponents (QGC, APLNG and GLNG) by specialist consultant, Sinclair Knight Mertz (SKM). The Department approved Revision 3 (dated May 2014) of the LTTMP on 2 July 2014. The Department approved subsequent revisions of the LTTMP on 3 August 2015 (Revision 4 dated June 2015), 24 March 2020 (Revision 5 dated January 2020) and 7 June 2024 (Revision 6 dated April 2024).	Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 3, May 2014 Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 4, June 2015 Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 5, January 2020 Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No.	The LNG proponents (including Santos GLNG) jointly engaged specialist consultant, SKM, to prepare a LTTMP (Revision 3 dated May 2014), which the Department approved on 2 July 2014. However, because this condition element relates to a 'preparation' requirement which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
				QCLNG-BX00-ENV-PLN-000070, Revision 6, April 2024		
36(a)	**Long-term Marine Turtle Management Plan** The plan (in either case referred to in 34 and 35 above), must include: (a) a program to establish comprehensive baseline information on populations of marine turtles that utilise the beaches and nearby waters of Curtis and Facing Island (including the Green Turtle *Chelonia mydas*, the Loggerhead Turtle *Caretta caretta*, and the Flatback Turtle *Natator depresses*);	Audit interview Review the Long-term Marine Turtle Management Plan Review management plans, procedures and records relating to marine turtles	Sections 2.0, 5.0 and Appendix B in the April 2024 LTTMP define and discuss the program requirement in this condition element. For example, Section 2.0 (Existing Information) in the April 2024 LTTMP includes: • Section 2.1 – Overview of the Gladstone Region; • Section 2.2 – Summary of Baseline Information on Marine Turtles; • Section 2.3 – Marine Turtles and the Gladstone Region, including sub-sections on the Green Turtle, Loggerhead Turtle, Hawksbill Turtle (which is not specified in this condition element), and Flatback Turtle; • Section 2.4 – Gap Analysis and Assessment of Values.	Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 6, April 2024	The LTTMP (Revision 6, April 2024) satisfies this condition element.	Compliance
36(b)	The plan (in either case referred to in 34 and 35 above), must include: (b) a monitoring program to measure and detect changes to the marine turtle populations over a period of at least 10 years from commencement of the	Audit interview Review the Long-term Marine Turtle Management Plan Review management plans,	Section 5.1 in the April 2024 LTTMP defines and discusses the statistical power requirement in this condition element.	Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 6, April 2024	The LTTMP (Revision 6, April 2024) satisfies this condition element.	Compliance

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	program. Monitoring methods must have the ability to detect changes at a statistical power of 0.8, or an alternative statistical power as determined in writing by the Minister;	procedures and records relating to marine turtles				
36(c)	The plan (in either case referred to in 34 and 35 above), must include: (c) the identification of significant activities relating to the construction and operation of LNG facilities (or in the case of an industry wide plan, activities within the Port of Gladstone) with the potential to cause adverse impacts on marine turtles;	Audit interview Review the Long-term Marine Turtle Management Plan Review management plans, procedures and records relating to marine turtles	Section 3.0 (Ecological Risk Assessment) in the April 2024 LTTMP identifies and describes the following significant activities as required by this condition element: • Section 3.1.1 – Boat Strike; • Section 3.1.2 – Lighting; • Section 3.1.3 – Dredging and Piling; and • Section 3.1.4 – Indirect Disturbance and Effects on Turtle Health.	Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 6, April 2024	The LTTMP (Revision 6, April 2024) satisfies this condition element.	Compliance
36(d)	The plan (in either case referred to in 34 and 35 above), must include: (d) management measures including operating controls and design features to help manage and avoid adverse impacts to marine turtles shown to be adversely impacted by LNG operations (or in the case of an industry wide plan, activities conducted within the Port of Gladstone). In relation to the LNG operations,	Audit interview Review the Long-term Marine Turtle Management Plan Review management plans, procedures and records relating to marine turtles	Section 4.0 (Management and Mitigation Strategies) in the April 2024 LTTMP identifies and describes management measures including operating controls and design features, to mitigate risks to marine turtles and their habitats from the following activity impacts: • Section 4.1 – Boat Strike; • Section 4.2 – Lighting – Table 11 within Section 4.2 includes flare design mitigation measures (e.g. flares to be constructed	Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 6, April 2024	The LTTMP (Revision 6, April 2024) satisfies this condition element.	Compliance

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	management measures will include any reasonable and practicable measures found necessary or desirable to minimise disturbance to marine turtles from gas flaring, and from lighting of the LNG plant and ships moored at the loading berth (except where the adoption of measures would be in contravention of health and safety legislative requirements).		as low as practicable to the ground) and lighting mitigation measures (e.g. Restricting the height of available light or applying shrouds to control direction); • Section 4.3 – Dredging and Piling; • Section 4.4 – Indirect disturbance.			
36(e)	The plan (in either case referred to in 34 and 35 above), must include: (e) Identification of annual contributions by the proponent, other LNG proponents who have confirmed an intention to establish an LNG Facility on Curtis Island and, in the case of an industry wide plan, contributions by other port users.	Audit interview Review the Long-term Marine Turtle Management Plan Review management plans, procedures and records relating to marine turtles	The Auditor considers that the requirement in this condition element includes identification of financial contributions; i.e. dollar amounts. Section 6.0 (Management, Funding, Auditing and Reviews) in the April 2024 LTTMP noted that: “Monitoring aspects of this LTTMP will be implemented by the three LNG proponents in partnership where agreement is able to be reached, with funding arrangements generally shared equally or as otherwise agreed among the LNG proponents. Each proponent will annually report its annual contribution to implementation of the LTTMP in its Annual Environmental Return that is published	Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 6, April 2024 Long-Term Turtle Management Plan – Annual Report 2025, issued by Eco Logical Australia Pty Ltd on 19 August 2025 (Version No. 2, Final)	The LTTMP (Revision 6, April 2024) satisfies this condition element by virtue of inclusion of relevant annual contribution details in Section 5.1 (including Table 17) of the LTTMP Annual Report 2025.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			following each anniversary of the approval of the LTTMP." Santos GLNG LNG Facility Annual Returns issued during the audit period do not include an "annual contribution" as referred to above. The only evidence of annual contributions by each LNG proponent (including Santos GLNG) over the 10-year period of the LTTMP is the LTTMP Annual Report 2025. Section 5.1, Table 17 in the LTTMP Annual Report 2025 recorded (in $AUD excluding GST) the "Total Funds Expended" and "Cost per LNG Proponent" for every LTTMP reporting year from 2016 to 2025. Section 5.1 in the 2025 report noted that the Total Funds Expended "include consultancy fees for Eco Logical Australia and their subconsultants, the purchase of field equipment, field trip running costs and reporting." Section 5.1 in the 2025 report also described expenditure by the LNG proponents in addition to the direct costs reported in Table 17, and estimated the LNG proponents' total expenditure over the life of the LTTMP.			

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
37.	**Long-term Marine Turtle Management Plan** The Marine Turtle Management Plan must be submitted for the approval of the Minister at least 3 months before the planned date of the commissioning of the first LNG train.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	Refer to the evidence for condition 26. The Auditor considers that 'commissioning' of the first LNG train occurred on or around 7 August 2015. By letter dated 16 May 2014, the LNG proponents submitted Revision 3 (May 2014) of the LTTMP to the Department for approval, based on Department review comments received on 17 March 2014.	Letter dated 16 May 2014, jointly signed by the LNG proponents to the Department, with attached proposed Long-Term Turtle Management Plan (Revision 3, May 2014) Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 3, May 2014 EPBC Approval 2008/4057 Dictionary definition of "Commissioning" "LNG Journal – The World's Leading LNG publication – March 2017" (pages 1 to 4) article titled: "Australian operational focus leads to successful GLNG performance" "Milestones" document (Excel file) screenshot provided by Santos GLNG with dates for LNG Train 1 of 7 August 2015 for "inlet area pressured up" and 24 September 2015 for "make LNG", and corresponding dates of 17 April 2016 and 25 May 2016 for LNG Train 2 Santos ASX Media Release dated 24 September 2015 on Santos website: https://www.santos.com/news/2015-glng-starts-lng-production-on-schedule/	The LNG proponents submitted the original version (i.e. Revision 3, May 2014) of the LTTMP to the Department on 16 May 2014, which was more than 3 months before the actual commissioning date of the first LNG train on or around 7 August 2015. However, because this condition element relates to a 'submission' requirement which occurred prior to the audit period (11 April 2022 to 4 December 2025), the Auditor considers that 'not applicable' is the most appropriate audit finding for this condition element.	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
37.	The approved Plan must be implemented.	Audit interview Site inspection Review the Long-term Marine Turtle Management Plan Review management plans, procedures and records relating to implementation of the Long-term Marine Turtle Management Plan	Section 6.0 (Management, Funding, Auditing and Reviews) of the April 2024 LTTMP noted that the required annual review report will be structured generally as follows: • Description of mitigation measures and operating controls implemented; • Overview of monitoring results and implications for marine turtle species and their habitats, and • Evaluation of the need for improvements to the conduct of operations and activities, based on the results of monitoring. If an impact on any marine turtle species is identified management measures and operating controls to mitigate impacts will be outlined. During the audit period, environmental consultant, Eco Logical Australia (engaged by the LNG proponents) issued annual LTTMP review reports as follows: • Annual Report 2022 issued 9 August 2022; • Annual Report 2023 issued 25 August 2023; • Annual Report 2024 issued 16 August 2024; and	Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 6, April 2024 Long-Term Turtle Management Plan – Annual Report 2022, issued by Eco Logical Australia Pty Ltd on 9 August 2022 (Version No. 2, Final) Long-Term Turtle Management Plan – Annual Report 2023, issued by Eco Logical Australia Pty Ltd on 25 August 2023 (Version No. 2, Final) Long-Term Turtle Management Plan – Annual Report 2024, issued by Eco Logical Australia Pty Ltd on 16 August 2024 (Version No. 3, Final) Long-Term Turtle Management Plan – Annual Report 2025, issued by Eco Logical Australia Pty Ltd on 19 August 2025 (Version No. 2, Final)	During the audit period, the three LNG proponents (including Santos GLNG) implemented the relevant approved LTTMP; i.e. Revision 5 of January 2020, and Revision 6 of April 2024.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			• Annual Report 2025 issued 19 August 2025. Section 4.2, Table 11 in the April 2024 LTTMP defines the following performance targets for mitigation actions to reduce the impacts of "Construction and operation of LNG facilities contributing to the sky glow of the Gladstone region" on marine turtles: "Assessment and monitoring of sky glow indicates no or minimal changes during turtle breeding season. No disruption to marine turtle nesting activities as a result of lighting from the LNG facilities, as determined by control charts on turtle nesting parameters on Curtis Island. No disruption to marine turtle hatchling emergence as a result of lighting from the LNG facilities, as determined by control charts on orientation on Curtis Island." Section 4.2, Table 16 in the LTTMP Annual Report 2025 recorded includes the following comments regarding the activity of "Construction and operation of LNG facilities contributing to the sky glow of the Gladstone region"; i.e. the performance targets defined above:			

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			“Construction lighting is no longer present. Operational lighting is required for operations and safety. Flaring occurs periodically as part of the operations phase. Operational light has been decreasing steadily since 2016-17, remaining stable in the past two years. All three LNG facilities are incrementally upgrading their lighting systems to apply new technology with reduced risks to marine turtles.” Section 5.1 (Expenditure on LTTMP Implementation) in the LTTMP Annual Report 2025 defines and discusses expenditure on implementation of the LTTMP for each reporting year from 2016 to 2025. GLNG personnel stated that the additional funds expended in 2024 (refer to the evidence for condition 36(e) in this audit report) included funding for tagging a higher number of marine turtles compared with previous years.			
38.	**Long-term Marine Turtle Management Plan** Within 60 days of each anniversary of the approval of the plan the proponent must provide a review report (“the Report”) on the effectiveness of the management measures and operating controls	Audit interview Review the Long-term Marine Turtle Management Plan Review records relating to	Section 6.0 in the April 2024 LTTMP describes the required annual review report structure will generally be as follows: • Description of mitigation measures and operating controls implemented;	Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 6, April 2024 Long-Term Turtle Management Plan – Annual Report 2022, issued by Eco Logical Australia	The Minister first approved the LTTMP (Revision 3, May 2014) on 2 July 2014 (anniversary date). Sixty days after the anniversary date is 31 August. Eco Logical Australia issued annual review reports (Annual	Compliance

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	directed at avoiding impacts on the marine turtle species. Note: The review report may be provided by the Gladstone Ports Corporation or another entity on behalf of the proponent.	proponent review reports	• Overview of monitoring results and implications for marine turtle species and their habitats, and • Evaluation of the need for improvements to the conduct of operations and activities, based on the results of monitoring. If an impact on any marine turtle species is identified management measures and operating controls to mitigate impacts will be outlined. During the audit period, environmental consultant, Eco Logical Australia (engaged by the LNG proponents) issued LTTMP annual review reports as follows: • Annual Report 2022 issued 9 August 2022; • Annual Report 2023 issued 25 August 2023; • Annual Report 2024 issued 16 August 2024; • Annual Report 2025 issued 19 August 2025. Section 1.1 (Background) in each of the above LTTMP Annual Reports notes that the relevant date for calculation of the 60 day limit is the original LTTMP (Revision 3) approval date of 2 July 2014.	Pty Ltd on 9 August 2022 (Version No. 2, Final) Long-Term Turtle Management Plan – Annual Report 2023, issued by Eco Logical Australia Pty Ltd on 25 August 2023 (Version No. 2, Final) Long-Term Turtle Management Plan – Annual Report 2024, issued by Eco Logical Australia Pty Ltd on 16 August 2024 (Version No. 3, Final) Long-Term Turtle Management Plan – Annual Report 2025, issued by Eco Logical Australia Pty Ltd on 19 August 2025 (Version No. 2, Final) QGC Annual Environmental Return EPBC 2008/4402 – LNG Plant and Onshore Facilities for 2022, 2023, 2024 and 2025 (reporting period from 22 October to 21 October), available on QGC website	Reports) for 2022, 2023, 2024 and 2025 within the 60 day limit. Each LTTMP Annual Report issued during the audit period, included content regarding the effectiveness of the management measures and operating controls directed at avoiding impact on marine turtle species. QGC's Annual Environmental Returns indicate that QGC, on behalf of the LNG proponents (including Santos GLNG), submitted the relevant LTTMP Annual Reports to the Department before 31 August in each year.	

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			The LTTMP Annual Report 2025 concluded: "There is no evidence from the results of LTTMP monitoring activities or from the technical advice provided by LTTMP research partners that the LNG facilities are having or have had an impact on marine turtles or their habitat that is important, notable or of consequence. Monitoring results will continue to be reviewed and assessed for signs of potential impacts on marine turtles and their habitats throughout the final five months of the LTTMP's implementation. Monitoring will be concluded at the end of 2025, in line with the LTTMP's 10-year currency. New scientific information collected through the monitoring program will enhance the future management of marine turtle populations." QGC's Annual Environmental Returns for EPBC Approval 2008/4402 (condition 38) record that QGC submitted the above LTTMP Annual Reports to the Department on 23 August 2022, 30 August 2023, 26 August 2024 and 29 August 2025.			

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
39.	**Long-term Marine Turtle Management Plan** If an impact on any of the marine turtle species is identified, the report must recommend improvements to the conduct of those operations and activities which are found to have a causal connection with the identified impact, and provide the report to the Minister in writing within 30 days of identifying the impact.	Audit interview Review records relating to proponent review reports Review relevant correspondence between proponent and Department and/or Minister	The LTTMP Annual Reports for 2022, 2023, 2024 and 2025 did not identify any adverse impact on marine turtle species which was attributable (i.e. causally connected) to any LNG proponent operations and activities. Section 4.2 (Review of impacts, risks and mitigation measures) in the LTTMP Annual Report 2022 noted that: "There is no evidence of impacts to marine turtles attributable to the LNG projects based on the data currently available. The potential for impacts will continue to be assessed as the monitoring tasks progress and further data on nesting, hatchling orientation, sky glow and health assessments are available." Section 5 (Conclusions) in the LTTMP Annual Report 2022 noted that: "There is no evidence from the information available or from discussion with key stakeholders that the LNG facilities are having or have had an impact on marine turtles or their habitat that is important, notable or of consequence." Section 4.2 (Review of impacts, risks and mitigation measures) in	Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 6, April 2024 Long-Term Turtle Management Plan – Annual Report 2022, issued by Eco Logical Australia Pty Ltd on 9 August 2022 (Version No. 2, Final) Long-Term Turtle Management Plan – Annual Report 2023, issued by Eco Logical Australia Pty Ltd on 25 August 2023 (Version No. 2, Final) Long-Term Turtle Management Plan – Annual Report 2024, issued by Eco Logical Australia Pty Ltd on 16 August 2024 (Version No. 3, Final) Long-Term Turtle Management Plan – Annual Report 2025, issued by Eco Logical Australia Pty Ltd on 19 August 2025 (Version No. 2, Final)	The LTTMP Annual Reports for 2022, 2023, 2024 and 2025 did not identify an impact on any of the monitored marine turtle species which was causally connected to the operations and activities of any LNG proponent (including Santos GLNG).	Not applicable

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Condition Number	Condition Element to be Audited	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
			the LTTMP Annual Report 2023 noted that: “There is no evidence of impacts to marine turtles attributable to the LNG projects based on the data currently available. The potential for impacts will continue to be assessed as the monitoring tasks progress and further data on nesting, hatchling orientation and health assessments are available.” Section 6 (Conclusions) in the LTTMP Annual Report 2023 noted that: “There is no evidence from the information available or from discussion with key research partners that the LNG facilities are having or have had an impact on marine turtles or their habitat that is important, notable or of consequence.” Section 5.2 (Review of impacts, risks and mitigation measures) in the LTTMP Annual Report 2024 noted that: “There is no evidence of impacts to marine turtles attributable to the LNG projects based on the data currently available. The potential for impacts will continue to be assessed as the monitoring tasks are			

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			finalised in 2025 and further data on nesting, hatchling orientation and health assessments are available for analysis of long-term trends.” Section 6 (Conclusions) in the LTTMP Annual Report 2024 noted that: “There is no evidence from the results of LTTMP monitoring activities or from the technical advice provided by LTTMP research partners that the LNG facilities are having or have had an impact on marine turtles or their habitat that is important, notable or of consequence.” Section 4.2 (Review of impacts, risks and mitigation measures) in the LTTMP Annual Report 2025 noted that: “The risk of lighting from the LNG facilities impacting nesting females and hatchling turtles was therefore reduced from Medium to Low in 2023, and has been maintained since this time. … There is no evidence of impacts to marine turtles attributable to the LNG projects based on the data currently available. The potential for impacts will continue to be assessed for the remainder of 2025, as the			

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			final monitoring tasks of the LTTMP are completed." Section 6 (Conclusions) in the LTTMP Annual Report 2025 noted that: "There is no evidence from the results of LTTMP monitoring activities or from the technical advice provided by LTTMP research partners that the LNG facilities are having or have had an impact on marine turtles or their habitat that is important, notable or of consequence."			
39.	The Minister may require improvements to be implemented. Note: To avoid doubt, if a condition of another approval held by the proponent requires a Marine Turtle Management Plan, the proponent may simultaneously meet the relevant requirements of both conditions by submitting a single plan. The plan may also be prepared and implemented in consultation with the Gladstone Ports Corporation or other bodies.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	GLNG personnel stated that during the audit period, the Minister did not require Santos GLNG to implement improvements to the conduct of operations and activities which are found to have a causal connection with an identified impact on marine turtle species.	Not applicable	This condition element was not triggered during the audit period.	Not applicable
40.	**Decommissioning Plan** Unless the proponent advises the Department that it cannot decommission the site because of lawful continuing use rights by a third party (that might include the State of Queensland), at least five years before the planned date of cessation of operations of the LNG Facility and associated	Audit interview Review management plans, procedures and records relating to a planned future de-commissioning	Operations at the LNG Facility must cease on the current expiry date of the Approval, on 31 October 2060. As of December 2025, there is no earlier planned date for the cessation of operations of the LNG Facility and associated infrastructure on Curtis Island.	Operations Environment Management Plan to Address Matters of National Environmental Significance and Environmental Authority Conditions for the LNG Facility and Marine Facilities, Doc. No. 3310-GLNG-5.1.3-0002, dated 17 August 2015 (August 2015 OEMP)	As of December 2025, the operation of the LNG Facility was not within five years before the planned date for cessation of operations. This condition element was not triggered during the audit period.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	infrastructure on Curtis Island the proponent must develop a Decommissioning Plan.	of the LNG Facility	Section 7 in the August 2015 OEMP notes that: "The LNG facility and associated infrastructure has a design life of 20 years but may continue operations for a longer period. Nevertheless, planning is required for its eventual closure. This section outlines the rehabilitation and decommissioning stages which will be required for the LNG facility and associated infrastructure. Rehabilitation and decommissioning plans will be developed in conjunction with regulatory agencies at least five years prior to closure. At that time there will be a greater understanding of the current decommissioning standards and alternative land uses available for the project site." Table 7-1 in the August 2015 OEMP comprises a one-page "Decommissioning Environmental Management Sub Plan". This Sub Plan notes that: "At least five years prior to closure of the LNG facility and associated infrastructure, a detailed site decommissioning plan will be developed to the satisfaction of the relevant authority that will establish procedures and methods for decommissioning.	Letter dated 2 October 2015 from Department to Santos GLNG with approval of the August 2015 OEMP		

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			The Auditor considers that Section 7 and Table 7-1 in the August 2015 OEMP, are limited in scope (see following paragraph), and should not be regarded as a Decommissioning Plan for the purpose of Approval condition 40. In particular, Section 7 and Table 7-1 do not define a timeline for the future implementation of decommissioning, as specified in Approval condition 40(b). The Auditor notes that the Department's approval letter of 2 October 2015 for the August 2015 OEMP stated that the OEMP satisfied Approval condition 24(i) in relation to inclusion of a 'rehabilitation program' for land disturbed during construction of the LNG Facility. Refer to the evidence for condition 27. As of December 2025, a Decommissioning Plan does not exist for the LNG Facility and associated infrastructure on Curtis Island.			
40(a)	The Plan must: (a) ensure that, following the cessation of operations at the LNG Facility and associated infrastructure on Curtis Island, decommissioning arrangements are prepared;	Audit interview Review management plans, procedures and records relating to a planned future de-commissioning	As of December 2025, the operation of the LNG Facility was not within five years before the planned date for cessation of operations. As of December 2025, a Decommissioning Plan does not exist for the LNG Facility and associated infrastructure on Curtis Island.	Not applicable	This condition element was not triggered during the audit period.	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
		of the LNG Facility				
40(b)(i)	The Plan must: (b) define a timetable for the future implementation of decommissioning including for: (i) the removal of remnant infrastructure and works that interfere with natural coastal processes, and human recreational and commercial activities;	Audit interview Review management plans, procedures and records relating to a planned future de-commissioning of the LNG Facility	Refer to the evidence for condition 40(a). As of December 2025, a Decommissioning Plan does not exist for the LNG Facility and associated infrastructure on Curtis Island.	Not applicable	This condition element was not triggered during the audit period.	Not applicable
40(b)(ii)	The Plan must: (b) define a timetable for the future implementation of decommissioning including for: (ii) the return of sediment levels and water quality in the immediate area of the LNG Facility to pre-construction background levels; and	Audit interview Review management plans, procedures and records relating to a planned future de-commissioning of the LNG Facility	Refer to the evidence for condition 40(a). As of December 2025, a Decommissioning Plan does not exist for the LNG Facility and associated infrastructure on Curtis Island.	Not applicable	This condition element was not triggered during the audit period.	Not applicable
40(b)(iii)	The Plan must: (b) define a timetable for the future implementation of decommissioning including for: (iii) the rehabilitation of the LNG Facility and associated sites to their natural state, and their	Audit interview Review management plans, procedures and records relating to a planned future de-commissioning	Refer to the evidence for condition 40(a). As of December 2025, a Decommissioning Plan does not exist for the LNG Facility and associated infrastructure on Curtis Island.	Not applicable	This condition element was not triggered during the audit period.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	ongoing management during rehabilitation.	of the LNG Facility				
41.	**Decommissioning Plan** If decommissioning does not commence on the date proposed in the initial Decommissioning Plan, the proponent must review the decommissioning plan before each subsequent third anniversary of the date of the submission of the initial decommissioning plan over the operational life of the LNG facility.	Audit interview Review management plans, procedures and records relating to a planned future de-commissioning of the LNG Facility	Refer to the evidence from condition 40(a). A three-yearly review of the Decommissioning Plan under this condition is only required if an initial Decommissioning Plan exists. As of December 2025, an initial Decommissioning Plan does not exist for the LNG Facility and associated infrastructure on Curtis Island.	Not applicable	This condition element was not triggered during the audit period.	Not applicable
41.	The proponent must advise the Minister in writing of the outcomes of this review, including any proposed changes to the Decommissioning Plan.	Audit interview Review management plans, procedures and records relating to a planned future de-commissioning of the LNG Facility Review relevant correspondence between proponent and Department and/or Minister	Refer to the evidence for condition 40(a). As of December 2025, a Decommissioning Plan does not exist for the LNG Facility and associated infrastructure on Curtis Island.	Not applicable	This condition element was not triggered during the audit period.	Not applicable
41.	Any proposed changes to the Decommissioning Plan must be	Audit interview Review relevant correspondence	Refer to the evidence for condition 40(a).	Not applicable	This condition element was not triggered during the audit period.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	approved in writing by the Minister.	between proponent and Department and/or Minister	As of December 2025, a Decommissioning Plan does not exist for the LNG Facility and associated infrastructure on Curtis Island.			
42.	**Decommissioning Plan** The Decommissioning Plan must be submitted for the approval of the Minister.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	Refer to the evidence for condition 40(a). As of December 2025, a Decommissioning Plan does not exist for the LNG Facility and associated infrastructure on Curtis Island.	Not applicable	This condition element was not triggered during the audit period.	Not applicable
42.	Decommissioning must not occur without approval.	Audit interview	Operations at the LNG Facility must cease on the current expiry date of the Approval, on 31 October 2060. As of December 2025, there is no earlier planned date for the cessation of operations of the LNG Facility and associated infrastructure on Curtis Island.	Not applicable	This condition element was not triggered during the audit period.	Not applicable
42.	Subject to condition 40 the approved Plan must be implemented on decommissioning.	Audit interview	As of December 2025, a Decommissioning Plan does not exist for the LNG Facility and associated infrastructure on Curtis Island.	Not applicable	This condition element was not triggered during the audit period.	Not applicable
43.	**Notification of Commencement** Within 20 business days of commencement of the action, the proponent must advise the Department in writing of the actual date of commencement.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	For the purpose of assessing compliance with this condition, the Auditor interprets this condition reference to "the action" as "construction". The Approval definition of "Commencement" excludes "minor physical	EPBC Approval 2008/4057 Dictionary definition of "Commencement" GLNG Annual Environmental Return 2011 EPBC No 2008/4057 LNG Facility, Doc. No. 3310-GLNG-4-1.3-0008	Based on the 'file reference' information for condition 43 compliance notes in the LNG Facility 2011 Annual Return, the Auditor considers that construction of the LNG Facility commenced on 27 April 2011.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			disturbance … prior to start of construction of the LNG Facility”. According to the LNG Facility 2011 Annual Return (condition 43 compliance note): “GLNG advised the Department on the 20/05/2011, that construction commenced on the 27/04/2011 (file reference: 3310-GLNG-4-8.7-0009).” The above notification date of 20 May 2011 is within 20 business days of construction commencement on 27 April 2011. Based on the ‘file reference’ information in the above notification, the Auditor considers that the “official launch” date of 27 May 2011 referred to in the Santos ASX Media Release of 27 May 2011, was not the actual date of commencement of construction.	Santos ASX Media Release of 27 May 2011: https://www.santos.com/news/prime-minister-launches-works-on-glng-plant/		
44.	**Notification of Commencement** If, at any time after five years from the date of this approval, the Minister notifies the proponent in writing that the Minister is not satisfied that there has been substantial commencement of the action, the action must not commence without the written agreement of the Minister.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	For the purpose of assessing compliance with this condition, the Auditor interprets this condition reference to “the action” as “construction”. Construction of the LNG Facility commenced on 27 April 2011, slightly more than six months after the Approval date of 22 October 2010.	GLNG Annual Environmental Return 2011 EPBC No 2008/4057 LNG Facility, Doc. No. 3310-GLNG-4-1.3-0008	This condition was never triggered, because construction of the LNG Facility commenced on 27 April 2011.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
45.	**Request for variation of plans by proponent** 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.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	During the audit period, the LTTMP was the only plan under this Approval which was formally revised and reissued; i.e. from Revision 5 (January 2020) to Revision 6 (April 2024). On 15 April 2024, QGC Pty Limited on behalf of the LNG proponents (including Santos GLNG), submitted a revised LTTMP to the Department for approval by the Minister, under the respective conditions of EPBC Approvals 2008/4057, 2008/4402 and 2009/4977. Santos GLNG endorsed the submission of the revised LTTMP, by email of 10 April 2024 to QGC, which is reproduced in Attachment 3 of QGC's letter of 15 April 2024 to the Department. The Executive Summary in the LTTMP Annual Report 2025 summarised the amendments made to the previous version (Revision 5, January 2020) of the LTTMP with the approval of the Department: "In summary, the amendments were: • A standard nesting census at Curtis Island and Wild Duck Island in the 2024-25 nesting season, instead of a full season census at Curtis	Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 5, January 2020 Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 6, April 2024 Long-Term Turtle Management Plan – Annual Report 2025, issued by Eco Logical Australia Pty Ltd on 19 August 2025 (Version No. 2, Final) Emailed letter dated 15 April 2024 from QGC Pty Limited on behalf of the LNG proponents, to the Department with an attached "next revision (6)" of Long-Term Turtle Management Plan for approval by the Minister, and including a summary and details of proposed changes Letter dated 7 June 2024 from Department to QGC Pty Limited regarding EPBC Approvals 2008/4057, 2008/4402 and 2009/4977, with approval of Long-Term Turtle Management Plan (Revision 6, April 2024)	On 15 April 2024, QGC on behalf of the LNG proponents (including Santos GLNG), submitted a revised LTTMP (Revision 6, April 2024) to the Department for approval by the Minister. **Observation No. 14** – Santos GLNG should consider relevant requirements in the Department's "Environmental management plan guidelines" (currently, Version 1.2, 2024) when preparing a revised plan under this Approval.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			Island and Avoid Island (amended task). • Deployment of satellite tags on nesting flatback turtles at Wild Duck Island (20 turtles) and Peak Island (20 turtles) in the 2024-25 nesting season, to identify inter-nesting habitats, migration routes and foraging grounds (new task). • A desktop study involving modelling of the flatback turtle nesting population at key rookeries of the Gladstone region using the latest available nesting data (new task). • A desktop analysis of migration routes and foraging habitats of flatback turtles tagged while nesting at Curtis Island, Avoid Island, Wild Duck Island and Peak Island (new task).”			
46.	**Request for variation of plans by proponent** If the Minister approves a revised plan, then that plan must be implemented instead of the plan originally approved.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	The Minister approved the revised LTTMP (Revision 6, April 2024) on 7 June 2024, which enabled the LNG proponents to implement the changes to the monitoring plan which commenced in June 2024. The Executive Summary in the LTTMP Annual Report 2025 notes that: “These new tasks [referred to in the above evidence for	Long-Term Turtle Management Plan – Annual Report 2025, issued by Eco Logical Australia Pty Ltd on 19 August 2025 (Version No. 2, Final) Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 6, April 2024 Letter dated 7 June 2024 from Department to QGC Pty Limited	During the audit period, the three LNG proponents (including Santos GLNG) implemented the revised Long-Term Turtle Management Plan (Revision 6, April 2024, under the respective conditions of EPBC Approvals 2008/4057, 2008/4402 and 2009/4977.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			condition 45] have been successfully implemented over the past 12 months, and all LTTMP activities are on schedule to be concluded by December 2025."	regarding EPBC Approvals 2008/4057, 2008/4402 and 2009/4977, with approval of Long-Term Turtle Management Plan (Revision 6, April 2024)		
47.	**Request for variation of plans by proponent** The proponent must implement the revised plan on approval of the Minister.	Audit interview Review relevant revised management plans and procedures	The Executive Summary in the LTTMP Annual Report 2025 notes that: "These new tasks [referred to in the above evidence for condition 45] have been successfully implemented over the past 12 months, and all LTTMP activities are on schedule to be concluded by December 2025."	Long-Term Turtle Management Plan – Annual Report 2025, issued by Eco Logical Australia Pty Ltd on 19 August 2025 (Version No. 2, Final) Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 6, April 2024 Letter dated 7 June 2024 from Department to QGC Pty Limited regarding EPBC Approvals 2008/4057, 2008/4402 and 2009/4977, with approval of Long-Term Turtle Management Plan (Revision 6, April 2024)	During the audit period, the three LNG proponents (including Santos GLNG) implemented the revised Long-Term Turtle Management Plan (Revision 6, April 2024, under the respective conditions of EPBC Approvals 2008/4057, 2008/4402 and 2009/4977.	Compliance
48.	**Request for variation of plans by proponent** Until the Minister has approved the revised plan, the proponent must continue to implement the original plan.	Audit interview Review relevant management plans and procedures	Revision 5 (issued January 2020) of the LTTMP operated from the start of the audit period (11 April 2022) until 7 June 2024 (the date of approval of Revision 6). Section 3 in the LTTMP Annual Report 2024 refers to the Department's approval of Revision 6 on 7 June 2024, and notes that Eco Logical Australia and the LNG proponents "have commenced implementation of the revised LTTMP".	Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 5, January 2020 Long-Term Turtle Management Plan – Annual Report 2024, issued by Eco Logical Australia Pty Ltd on 16 August 2024 (Version No. 3, Final)	Based on information in Section 3 of the LTTMP Annual Report 2024, the LNG proponents (including Santos GLNG) continued to implement Revision 5 of the LTTMP until 7 June 2024, i.e. the date that the Department approved Revision 6 of the LTTMP.	Compliance

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
49.	**Revisions to plans by the Minister** 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, specified revisions to a plan approved by the Minister under these conditions.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	GLNG personnel stated that during the audit period, the Minister did not request Santos GLNG to make any specified revisions to a plan approved by the Minister under the conditions of this Approval.	Not applicable	This condition was not triggered during the audit period.	Not applicable
50(a)	**Revisions to plans by the Minister** If the Minister makes a request for revisions to a plan, the proponent must: (a) comply with that request; and	Audit interview Review relevant correspondence between proponent and Department and/or Minister	GLNG personnel stated that during the audit period, the Minister did not request Santos GLNG to make any specified revisions to a plan approved by the Minister under the conditions of the Approval.	Not applicable	This condition element was not triggered during the audit period.	Not applicable
50(b)	If the Minister makes a request for revisions to a plan, the proponent must: (b) submit the revised plan to the Minister for approval within the period specified in the request.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	GLNG personnel stated that during the audit period, the Minister did not request Santos GLNG to make any specified revisions to a plan approved by the Minister under the conditions of the Approval.	Not applicable	This condition element was not triggered during the audit period.	Not applicable
51.	**Revisions to plans by the Minister** The proponent must implement the revised plan, on written approval of the Minister.	Audit interview Review relevant revised management plans and procedures	GLNG personnel stated that during the audit period, the Minister did not request Santos GLNG to make any specified revisions to a plan approved by the Minister under the conditions of the Approval.	Not applicable	This condition element was not triggered during the audit period.	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
52.	**Revisions to plans by the Minister** Until the Minister has approved the revised plan, the proponent must continue to implement the original plan.	Audit interview Review relevant management plans and procedures	GLNG personnel stated that during the audit period, the Minister did not request Santos GLNG to make any specified revisions to a plan approved by the Minister under the conditions of the Approval.	Not applicable	This condition element was not triggered during the audit period.	Not applicable
53.	**Minimum timeframes for consideration of plans** 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 any plan, unless otherwise agreed in writing between the proponent and the Minister.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	The Auditor considers that a revised plan which has been submitted for approval by the Minister, is a "plan" for the purpose of interpreting this condition. The only plan which Santos GLNG (as a LNG proponent) sought to revise during the audit period (11 April 2022 to 4 December 2025), was the LTTMP (Revision 5, January 2020). On 15 April 2024, QGC on behalf of the LNG proponents (including Santos GLNG), submitted a revised LTTMP (Revision 6, April 2024) to the Department for approval by the Minister. The Minister approved the revised LTTMP (Revision 6, April 2024) on 7 June 2024.	Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 6, April 2024 Emailed letter dated 15 April 2024 from QGC Pty Limited on behalf of the LNG proponents, to the Department with an attached "next revision (6)" of Long-Term Turtle Management Plan for approval by the Minister, and including a summary and details of proposed changes Letter dated 7 June 2024 from Department to QGC Pty Limited regarding EPBC Approvals 2008/4057, 2008/4402 and 2009/4977, with approval of Long-Term Turtle Management Plan (Revision 6, April 2024)	On 15 April 2024, QGC on behalf of the LNG proponents (including Santos GLNG), submitted a revised LTTMP (Revision 6, April 2024) to the Department for approval by the Minister. The Minister approved the revised LTTMP on 7 June 2024; i.e. more than 20 business days after 15 April 2024.	Compliance
54.	**Provision of State plans** If a condition of a State approval requires the proponent to provide a plan then the proponent must also provide the plan to the Department or Minister on	Audit interview Review relevant correspondence between proponent and	Condition A24 of Environmental Authority No. EPPG00712213 (EA) requires the holder to provide any documentation required by the EA (i.e. inclusive of management plans) to the	Environmental Authority No. EPPG00712213 (EA), issued by the Queensland Department of the Environment, Tourism, Science and Innovation (DETSI) on 26 May 2021	During the audit period, the Department or Minister did not request Santos GLNG to provide the Department or Minister with a plan required under	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	request, within the period specified in the request.	Department and/or Minister	administering authority (DETSI) on request. GLNG personnel stated that during the audit period, the Department or Minister did not request Santos GLNG to provide the Department or Minister with a plan required under the EA.		Environmental Authority No. EPPG00712213.	
55.	**Compliance with State environmental and other authorities** The proponent must comply with all environmental authorisations issued by the State, including conditions of an environmental authority issued under the EP Act.	Audit interview Review relevant Environmental Authority audits of the LNG Facility	Environmental Authority No. EPPG00712213 (EA) requires independent audits to be conducted every three years. The Queensland Department of Environment, Science and Innovation (DESI, now known as DETSI) notified Santos GLNG by letter of 14 May 2024, of a non-compliance against EA condition A15. The non-compliance against EA condition A15 was that Santos did not obtain DESI's acceptance of the nominated auditor (Kurt Hammerschmid) prior to the conduct of an EA audit in July 2023. The DESI letter of 14 May 2024 also refers to a non-compliance by Santos GLNG against EA condition B20 (regarding a marine flaring event) on 21 July 2021. GLNG personnel stated that the reference to the incident date of 21 July 2022 in the DESI letter is incorrect. The non-compliance against EA condition B20	Environmental Authority No. EPPG00712213 (EA), issued by the Queensland Department of the Environment, Tourism, Science and Innovation (DETSI) on 26 May 2021 EA audit report for July 2023 EA audit, issued by Integrated Environmental Systems Pty Ltd on 19 September 2023 Letter dated 14 May 2024 from Queensland Department of Environment, Science and Innovation (DESI, now known as DETSI) to Santos GLNG, regarding DESI's determination of a non-compliance against EA condition A15 and the non-compliance identified in the September 2023 EA audit report against EA condition B20 (note: in relation to condition B20, the DESI letter mistakenly refers to "2022" instead of "2021"). Operations Environment Management Plan to Address Matters of National Environmental Significance and Environmental Authority Conditions for the LNG	**Non-compliance No. 1** – By letter of 14 May 2024, the then Queensland Department of Environment, Science and Innovation (DESI) notified Santos GLNG of a non-compliance against condition A15 of Queensland Environmental Authority No. EPPG00712213 (EA), regarding the requirement for Santos GLNG to obtain DESI's acceptance of the nominated third party auditor for an EA audit which was conducted in July 2023. **Recommendation No. 1** – Santos GLNG should review its administrative processes in relation to the identified non-compliance against EA condition A15.	Non-compliance

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			occurred prior to the audit period for this audit. Other LNG Facility authorisations issued for and on behalf of the State of Queensland include licences referred to in Table 1-5 of the August 2015 OEMP: • “Petroleum Facilities Licence (PFL) 10, granted on 4 March 2011 by the Department of natural resources and Mines (DNRM) under Section 446(1) of the *Petroleum and Gas (Production and Safety) Act 2004*”; and • “Major Hazard Facility Licence (Number 10029) under the Queensland *Work Health and Safety Regulation 2011* (the WHS Regulation), granted by Workplace Health and Safety Queensland (WHSQ) on 2nd September, 2013 following submission of a ‘Safety Case” earlier in 2013.” Due to the time constraints of this audit, the Auditor did not review the currency of these other authorisations, or Santos GLNG’s compliance status against these other authorisations during the audit period.	Facility and Marine Facilities, Doc. No. 3310-GLNG-5.1.3-0002, dated 17 August 2015 (August 2015 OEMP)		

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
56.	**Timeframes** If these conditions require the proponent to provide something by a specified time, a longer period may be specified in writing by the Minister.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	The Department (on behalf of the Minister) approved Santos GLNG requests for extensions of time relating to the conduct of this audit in December 2025. Relevant correspondence is reproduced in Appendix B of this audit report. GLNG personnel stated that other than in relation to this audit, during the audit period Santos GLNG did not make any requests for an extension of time to provide something by a specified time.	Not applicable	Santos GLNG requested and complied with the extensions of time approved by the Department (on behalf of the Minister) relating to the conduct of this audit.	Compliance
57(a)	**Auditing** 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	Audit interview Review relevant correspondence between proponent and Department and/or Minister	Santos GLNG engaged Integrated Environmental Systems Pty Ltd to conduct this EPBC Approval audit.	Letter dated 31 January 2025 from Department to Santos GLNG with request for Santos GLNG to ensure an independent audit of compliance with the conditions of the EPBC 2008/4057 Approval is conducted Letter dated 24 March 2025 from Department to Santos GLNG with approval of independent auditors (Kurt Hammerschmid and Adam Jones)	Santos GLNG ensured that an independent audit of compliance with the conditions of this Approval was conducted, in accordance with timeframes agreed to by the Department.	Compliance
57(b)	On the request of and within a period specified by the Department, the proponent must ensure that: (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.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	GLNG personnel stated that they understood this requirement.	Letter dated 31 January 2025 from Department to Santos GLNG with request for Santos GLNG to ensure that an audit report is published on the internet and submitted to the Department	This condition element will be triggered after the final version of the audit report is approved by the Department and issued.	Not applicable

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
58(a)	**Auditing** Before the audit begins, the following must be approved by the Department: (a) the independent auditor; and	Audit interview Review relevant correspondence between proponent and Department and/or Minister	By letter dated 24 March 2025 to Santos GLNG, the Department approved the auditors, Kurt Hammerschmid and Adam Jones, to conduct this independent audit under condition 57 of the Approval.	Email of 19 March 2025 from Santos GLNG to Department with information regarding proposed independent auditors (Kurt Hammerschmid and Adam Jones) and request for approval Letter dated 24 March 2025 from Department to Santos GLNG with approval of the independent auditors	The Department approved the independent auditors prior to commencement of this audit.	Compliance
58(b)	Before the audit begins, the following must be approved by the Department: (b) the audit criteria.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	By letter dated 25 July 2025 to Santos GLNG, the Department approved the audit criteria for this audit.	Email of 27 June 2025 from Santos GLNG to Department with attached audit criteria and methodology issued by the Auditors on 25 June 2025, and request for approval Letter dated 25 July 2025 from Department to Santos GLNG with approval of audit criteria	The Department approved the audit criteria prior to commencement of this audit.	Compliance
59(a)	**Auditing** The audit report must include: (a) the components of the project being audited;	Audit interview	GLNG personnel stated that they understood this requirement.	Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of the *Environment Protection and Biodiversity Conservation Act 1999*, issued by DCCEEW (2019)	This audit report includes the components of the project being audited.	Compliance
59(b)	The audit report must include: (b) the conditions that were activated during the period covered by the audit;	Audit interview	GLNG personnel stated that they understood this requirement.	Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of the *Environment Protection and Biodiversity Conservation Act 1999*, issued by DCCEEW (2019)	This audit report includes the conditions that were activated during the audit period (11 April 2022 to 4 December 2025).	Compliance

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
59(c)	The audit report must include: (c) a compliance/non-compliance table;	Audit interview	GLNG personnel stated that they understood this requirement.	Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of the *Environment Protection and Biodiversity Conservation Act 1999*, issued by DCCEEW (2019)	This audit report includes a compliance/non-compliance table; i.e. this Independent Audit Table.	Compliance
59(d)	The audit report must include: (d) a description of the evidence to support audit findings of compliance or non-compliance;	Audit interview	GLNG personnel stated that they understood this requirement.	Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of the *Environment Protection and Biodiversity Conservation Act 1999*, issued by DCCEEW (2019)	This audit report includes a description of the evidence to support audit findings of either compliance, non-compliance or not applicable.	Compliance
59(e)	The audit report must include: (e) recommendations on any non-compliance or other matter to improve compliance;	Audit interview	GLNG personnel stated that they understood this requirement.	Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of the *Environment Protection and Biodiversity Conservation Act 1999*, issued by DCCEEW (2019)	This audit report includes a recommendation for each identified non-compliance, and observations for consideration by Santos GLNG to potentially improve compliance.	Compliance
59(f)	The audit report must include: (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);	Audit interview	GLNG personnel stated that they understood this requirement. The final issued version of this audit report will include the proponent's response to the recommendations in the report. The Auditor interprets the reference to 'recommendations' in this condition element, as including: a) the recommendation relating to each non-compliance; and b) the recommendation in each observation. This	Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of the *Environment Protection and Biodiversity Conservation Act 1999*, issued by DCCEEW (2019)	Appendix F in this audit report comprises Santos GLNG's responses to recommendations in this report.	Compliance

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Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			interpretation is consistent with the wording of condition 59(e). The Auditor considers that this condition element and condition 62 require a significant duplication of effort by Santos GLNG.			
59(g)	The audit report must include: (g) certification by the independent auditor of the findings of the audit report.	Audit interview	GLNG personnel stated that they understood this requirement.	Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of the *Environment Protection and Biodiversity Conservation Act 1999*, issued by DCCEEW (2019)	The final issued version of this audit report includes certification by the independent auditors, of the findings of the audit report.	Compliance
60.	**Auditing** The financial cost of the audit will be borne by the proponent.	Audit interview Review proponent's Purchase Order for EPBC Approval Audit	On 3 July 2025, Santos GLNG issued a Purchase Order to Integrated Environmental Systems Pty Ltd, for the proposed financial cost of this audit.	Santos GLNG Purchase Order No. 4800046493, dated 3 July 2025	Santos GLNG is contractually required to pay the financial cost of this audit.	Compliance
61(a)	**Auditing** The proponent must: (a) implement any recommendations in the audit report, as directed in writing by the Department;	Audit interview	GLNG personnel stated that they understood this requirement.	Not applicable	This condition element will be potentially triggered after the Department's receipt of the audit report, if the Department directs Santos GLNG to implement a recommendation in the report.	Not applicable
61(b)	The proponent must: (b) investigate any non-compliance identified in the audit report; and	Audit interview	GLNG personnel stated that they understood this requirement.	Not applicable	This condition element will be triggered after the final version of this audit report is issued.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
61(c)	The proponent must: (c) if non-compliance is identified in the audit report - take action as soon as practicable to ensure compliance with these conditions.	Audit interview	GLNG personnel stated that they understood this requirement.	Not applicable	This condition element will be triggered after the final version of this audit report is issued.	Not applicable
62(a)	**Auditing** 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	Audit interview	GLNG personnel stated that they understood this requirement. The Auditor considers that this condition and condition 59(f) require a significant duplication of effort by Santos GLNG.	Not applicable	This condition element will be triggered after the Department's receipt of the final version of this audit report.	Not applicable
62(b)	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: (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: To avoid doubt, independent third-party auditing may include audit	Audit interview	GLNG personnel stated that they understood this requirement.	Not applicable	This condition element will be triggered after the Department's receipt of the final version of this audit report.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	of the proponent's performance against the requirements of any plan required under these conditions.					
63(a)	**Reporting non-compliance** The proponent must, when first aware of a non-compliance of any condition of this approval, 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	Audit interview Review relevant correspondence between proponent and Department and/or Minister	GLNG personnel stated that during the audit period, Santos GLNG was not required to provide a report to the Department of a non-compliance: • against a condition of the Approval; or • against a plan required to be approved by the Minister under these conditions. The Auditor considers that this reporting requirement was not triggered for the non-compliance findings identified in this audit report, because: a) this report was issued after the audit period; and b) Santos GLNG, in good faith, had not previously identified (i.e. was not previously aware of) these non-compliances. The Auditor considers that this audit report (including the completed Appendix F) will satisfy the requirements of condition 63 in relation to the non-compliance findings identified in this report.	Not applicable	This condition element was not triggered during the audit period.	Not applicable
63(b)	The proponent must, when first aware of a non-compliance of any condition of this approval, or a plan required to be approved by the Minister under these conditions:	Audit interview Review relevant correspondence between proponent and	Refer to the evidence for condition 63(a).	Not applicable	This condition element was not triggered during the audit period.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
	(b) bring the matter into compliance within a reasonable timeframe agreed to, in writing by the Department.	Department and/or Minister				
64(a)	**Record-keeping** 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 by the Minister under these conditions; and	Audit interview Review relevant records relating to activities associated with or relevant to the EPBC Approval Review management plans, procedures and records relating to implementation of plans	GLNG personnel stated that they have access to all relevant records, including, for example: • data from Long-Term Turtle Management Plan monitoring activities conducted during the audit period by environmental consultant, Eco Logical Australia Pty Ltd; • GLNG Flare Register; and • GLNG Laboratory water quality sampling results from the on-site Sediment Basins, relevant to the issuing of Dewatering Permits for releases of water collected in those Basins. Refer to the evidence for the third element of condition 28, for examples of Dewatering Permits issued during the audit period.	GLNG DSO Flare Register (Excel file), created 5 May 2019, last modified 3 December 2025, date range from 28 March 2021 to 4 October 2025 Water worksheet for water quality sampling of on-site Sediment Basins 1, 2 and 3, date range from 18 November 2025 to 3 December 2025 “Appendix A – Sediment Basin Discharge Assessment (Dewatering Permit)” inclusive of water quality results and GLNG Downstream Laboratory sample reports Long-Term Turtle Management Plan – Annual Report 2022, issued by Eco Logical Australia Pty Ltd on 9 August 2022 (Version No. 2, Final) Long-Term Turtle Management Plan – Annual Report 2023, issued by Eco Logical Australia Pty Ltd on 25 August 2023 (Version No. 2, Final) Long-Term Turtle Management Plan – Annual Report 2024, issued by Eco Logical Australia Pty Ltd on 16 August 2024 (Version No. 3, Final)	During the audit period, Santos and its contracted consultants generated and retained accurate records substantiating all activities associated with or relevant to these conditions of approval, including measures taken to implement a plan approved by the Minister under these conditions.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
				Long-Term Turtle Management Plan – Annual Report 2025, issued by Eco Logical Australia Pty Ltd on 19 August 2025 (Version No. 2, Final)		
64(b)	The proponent must: (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 of approval. Note: Summaries of audits carried out under these conditions, or under section 458 of the EPBC Act, will be posted on the Department's website. The results of such audits may also be publicised through the general media.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	GLNG personnel stated that during the audit period, the Department did not request Santos GLNG to provide it with any record required to be maintained under condition 64(a).	Not applicable	This condition element was not triggered during the audit period.	Not applicable
65(a)	**Financial assurance** 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	Audit interview Review relevant financial assurance records Review relevant correspondence between proponent and Department and/or Minister	The Auditor notes that as of December 2025, the Minister has not implemented a financial assurance mechanism at the Australian Government level in relation to this Approval. All financial assurances currently required to be held in relation to the LNG Facility are administered and held by the Queensland Government. GLNG personnel stated that during the audit period, the Minister did not require Santos	Not applicable	This condition element was not triggered during the audit period.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			GLNG to provide a financial assurance under condition 65(a).			
65(b)	The proponent must: (b) review and maintain the amount of financial assurance based on proponent reporting on compliance with these conditions, and any auditing of the activities.	Audit interview Review relevant financial assurance records	Refer to the evidence for condition 65(a). GLNG personnel stated that during the audit period, the Minister did not require Santos GLNG to provide a financial assurance under condition 65(a).	Not applicable	This condition element was not triggered during the audit period.	Not applicable
66.	**Financial assurance** 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.	Audit interview	Refer to the evidence for condition 65(a). GLNG personnel stated that during the audit period, the Minister did not require Santos GLNG to provide a financial assurance under condition 65(a).	Not applicable	This condition was not triggered during the audit period.	Not applicable
67(a)	**Annual Environmental Return** The proponent must produce an Annual Environmental Return which: (a) addresses compliance with these conditions;	Audit interview Review relevant Annual Environmental Returns	During the audit period (11 April 2022 to 4 December 2025), Santos GLNG produced Annual Environmental Returns (i.e. LNG Facility Annual Returns). The reporting period for each Annual Return is from 22 October to 21 October. During the audit period, LNG Facility Annual Returns were issued on 14 November 2022, 17 November 2023, 18 November 2024 and 17 November 2025. Compliance with Approval conditions is addressed in	EPBC Approval 2008/4057 GLNG LNG Facility Annual Return 2022, dated 14 November 2022 EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2023, dated 17 November 2023 EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2024, dated 18 November 2024 EPBC Approval No. 2008/4057 Santos GLNG LNG Facility	The LNG Facility 2022, 2023, 2024 and 2025 Annual Returns include content relevant to the status of compliance, which addresses the requirements of this condition element.	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			Section 2.1 and Table 1 - Compliance with Conditions of EPBC Act Approval No. 2008/4057, within each Annual Return. The LNG Facility 2024 and 2025 Annual Returns include an 'Is the Project compliant with the condition' column, in addition to comments regarding compliance with each applicable condition. The LNG Facility 2022 and 2023 Annual Returns did not include a separate compliance status column, but instead included comments regarding compliance with each applicable condition.	Annual Return 2025, dated 17 November 2025		
67(b)	The proponent must produce an Annual Environmental Return which: (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;	Audit interview Review relevant Annual Environmental Returns	The following sections in the LNG Facility 2022, 2023, 2024 and 2025 Annual Returns address this condition element: • Section 2.2.1 – No unavoidable adverse impacts on MNES were recorded. Activities were undertaken in accordance with the Approval and the OEMP. • Section 2.2.2 – Mitigation measures are applied as detailed in the OEMP and other approved environmental plans. • Section 2.2.3 – No rehabilitation works have been undertaken on site since rehabilitation works on a	EPBC Approval 2008/4057 GLNG LNG Facility Annual Return 2022, dated 14 November 2022 EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2023, dated 17 November 2023 EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2024, dated 18 November 2024 EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2025, dated 17 November 2025	The LNG Facility 2022, 2023, 2024 and 2025 Annual Returns include content which addresses the requirements of this condition element. **Observation No. 15** – Santos GLNG could schedule and retain records of periodic field-based assessments of the effectiveness of mitigation measures applied to avoid an adverse impact on Matters of National Environmental Significance (MNES). For example, Santos GLNG could assess whether an applied mitigation measure for a potential adverse impact on MNES reduces the residual risk of the potential adverse impact either to a lower	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			small (approximately 1.07ha) former soil stockpile area were undertaken and handed back to the Coordinator General (the landholder) on 23 October 2020.		residual risk status or 'As Low As Reasonably Practicable'.	
67(c)	The proponent must produce an Annual Environmental Return which: (c) identifies all non-compliances with these conditions;	Audit interview Review relevant Annual Environmental Returns	Section 2.2.4 in the LNG Facility 2022 Annual Return stated: "In relation to condition 67(c) compliance with conditions of this EPBC Approval. No incidents were reported to the Department as potential non-compliances with this EPBC Approval during the 2022 AER period." Section 2.3 in the LNG Facility 2023, 2024 and 2025 Annual Returns stated: "In relation to condition 67(c) compliance with conditions of this EPBC Approval. No incidents were reported to the Department as potential non-compliances with this EPBC Approval during the [year] AER Reporting period." The LNG Facility 2024 Annual Return did not identify any non-compliance against conditions of Environmental Authority No. EPPG00712213 (EA), which relate to Approval condition 55. Refer to the non-compliance audit finding against condition 55 in this audit report.	EPBC Approval 2008/4057 GLNG LNG Facility Annual Return 2022, dated 14 November 2022 EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2023, dated 17 November 2023 EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2024, dated 18 November 2024 EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2025, dated 17 November 2025 GLNG Annual Environmental Return 2016 EPBC No. 2008/4057 LNG Facility, Doc. No. 3310-GLNG-5-1.3-0040	**Non-compliance No. 2** – The LNG Facility 2024 Annual Return did not identify the non-compliance against Approval condition 55 which resulted from the non-compliance against EA condition A15 which was notified by letter of 14 May 2024 from the then Queensland Department of Environment, Science and Innovation to Santos GLNG. **Recommendation No. 2** – Santos GLNG should ensure that any non-compliance identified against an EA condition is also identified in the relevant LNG Facility Annual Return.	Non-compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			The most recent example of a LNG Facility Annual Return which identified a non-compliance as required by condition 67(c), is the LNG Facility 2016 Annual Return (in Section 4 and Appendix 1).			
67(d)	The proponent must produce an Annual Environmental Return which: (d) identifies any amendments needed to plans to achieve compliance with these conditions.	Audit interview Review relevant Annual Environmental Returns	Section 2.2.5 in the LNG Facility 2022 Annual Return stated, in relation to condition 67(d): "There were no amendments made to plans during the AER Period." Section 2.4 in the LNG Facility 2023, 2024 and 2025 Annual Returns stated, in relation to condition 67(d): "There were no amendments made to plans during the AER Reporting period."	EPBC Approval 2008/4057 GLNG LNG Facility Annual Return 2022, dated 14 November 2022 EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2023, dated 17 November 2023 EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2024, dated 18 November 2024 EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2025, dated 17 November 2025 GLNG Annual Environmental Return 2013 EPBC No 2008/4057 LNG Facility Document Number: 3301-GLNG-4-1.3-0064	During the audit period, Santos GLNG did not identify any amendments needed to plans to achieve compliance with the conditions of the Approval.	Compliance
68.	**Annual Environmental Return** The proponent must publish the Annual Environmental Return on its website within 20 business days of each anniversary date of this approval.	Audit interview Review proponent's website	The anniversary date of the Approval is 22 October. Section 1.0 in the LNG Facility 2022 Annual Return states that the return will be published on the Santos website by 18 November 2022. Section 1 in the LNG Facility 2023 Annual Return states that the return will be published on the	Santos website page: https://www.santos.com/about-us/corporate-governance/glng/ EPBC Approval 2008/4057 GLNG LNG Facility Annual Return 2022, dated 14 November 2022 EPBC Approval No. 2008/4057 Santos GLNG LNG Facility	Based on information in each Annual Environmental Return (i.e. LNG Facility Annual Return) issued during the audit period regarding the intended website publication date, the Auditor considers that each LNG Facility Annual Return was published on the Santos GLNG website within	Compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			Santos website by 17 November 2023. Section 1 in the LNG Facility 2024 Annual Return states that the return will be published on the Santos website by 18 November 2024. Section 1 in the LNG Facility 2025 Annual Return states that the return will be published on the Santos website by 17 November 2025.	Annual Return 2023, dated 17 November 2023 EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2024, dated 18 November 2024 EPBC Approval No. 2008/4057 Santos GLNG LNG Facility Annual Return 2025, dated 17 November 2025	20 business days of the anniversary date of this Approval.	
68.	In complying with this publication requirement, the proponent must ensure that it has obtained the relevant confidentiality and intellectual property rights of third parties.	Audit interview Review relevant correspondence between proponent and third parties relating to third party confidentiality and intellectual property rights	GLNG personnel stated that the content of the LNG Facility 2022, 2023, 2024 and 2025 Annual Returns did not include any confidential information provided by third parties.	Not applicable	The LNG Facility 2022, 2023, 2024 and 2025 Annual Returns did not include any confidential information provided by third parties.	Not applicable
69.	**Survey data** If requested by the Department, the proponent must provide all species and ecological survey data and related survey information from ecological surveys undertaken for MNES.	Audit interview Review relevant species and ecological survey data and related survey information Review relevant correspondence between proponent and	GLNG personnel stated that during the audit period, the Department did not request Santos GLNG to provide any species and ecological survey data and related survey information from ecological surveys undertaken for Matters of National Environmental Significance.	Not applicable	This condition element was not triggered during the audit period.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
		Department and/or Minister				
69.	The data must be collected and recorded to conform to data standards notified from time to time by the Department.	Audit interview Review relevant species and ecological survey data and related survey information Review relevant correspondence between proponent and Department and/or Minister	GLNG personnel stated that during the audit period, the Department did not request Santos GLNG to provide any data or information as referred to in this condition.	Not applicable	This condition element was not triggered during the audit period.	Not applicable
70.	**Publication of Plans** 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.	Audit interview Review proponent's website	The Auditor considers that a revised plan which has been approved by the Minister, is a "plan" for the purpose of interpreting this condition. GLNG personnel stated that the only plan approved by the Minister/Department under this Approval during the audit period (11 April 2022 to 4 December 2025) was the Long-Term Turtle Management Plan (Revision 6, April 2024). The Department's letter of 7 June 2024 refers to approval of the revised LTTMP under condition 45 of this Approval. The Department's letter of 7 June 2024 also noted:	Santos website page: https://www.santos.com/about-us/corporate-governance/glng/ Long-Term Turtle Management Plan (LTTMP), LNG Facilities – Curtis Island, Gladstone, Doc. No. QCLNG-BX00-ENV-PLN-000070, Revision 6, April 2024 Letter dated 7 June 2024 from Department to QGC Pty Limited regarding EPBC Approvals 2008/4057, 2008/4402 and 2009/4977, with approval of Long-Term Turtle Management Plan (Revision 6, April 2024)	**Non-compliance No. 3** – As of 4 December 2025 (the end of the audit period), the current approved Long-Term Turtle Management Plan (Revision 6, April 2024) was not published on the Santos GLNG website. The Auditor acknowledges that: • as of 4 December 2025, an obsolete approved version (Revision 4, June 2015) of the Long-Term Turtle Management Plan was published on the Santos GLNG website; and • on 3 February 2026, Santos GLNG published the current approved Long-Term Turtle Management Plan (Revision	Non-compliance

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
			"The approved plan must also be published in accordance with the conditions of each approval."		6, April 2024) on the Santos GLNG website. **Recommendation No. 3** – Santos GLNG should review its administrative processes to ensure future compliance with this condition.	
71.	**Publication of Plans** The Department may request the proponent to publish on the internet a plan in a specified location or format and with specified accompanying text.	Audit interview Review relevant correspondence between proponent and Department and/or Minister	GLNG personnel stated that during the audit period, the Department did not request Santos GLNG to publish on the internet a plan in a specified location or format and with specified accompanying text.	Not applicable	This condition element was not triggered during the audit period.	Not applicable
71.	The proponent must comply with any such request.	Audit interview	GLNG personnel stated that during the audit period, the Department did not request Santos GLNG to publish on the internet a plan in a specified location or format and with specified accompanying text.	Not applicable	This condition element was not triggered during the audit period.	Not applicable
72.	**Dictionary** The Auditor acknowledges the definitions included within the Dictionary of EPBC Approval 2008/4057. This condition is for reference purposes only (i.e. an assessment of compliance is not required).	Not applicable	Not applicable	Not applicable	This condition is for reference purposes only and does not impose an auditable requirement.	Not applicable

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project – EPBC Approval 2008/4057						
Condition Number	**Condition Element to be Audited**	**Verification Method**	**Evidence**	**Documents Sighted**	**Determination**	**Compliance Finding**
73.	**Dictionary** This interpretative condition is for reference purposes only (i.e. an assessment of compliance is not required).	Not applicable	Not applicable	Not applicable	This condition is for reference purposes only and does not impose an auditable requirement.	Not applicable
74.	**Dictionary** This interpretative condition is for reference purposes only (i.e. an assessment of compliance is not required).	Not applicable	Not applicable	Not applicable	This condition is for reference purposes only and does not impose an auditable requirement.	Not applicable
Figure 1	**Proposed location of Santos LNG components on Curtis Island** This Figure is for reference purposes only (i.e. an assessment of compliance is not required).	Not applicable	Not applicable	Not applicable	The Auditor has not counted Figure 1 as a condition in the total number of conditions. Figure 1 is for reference purposes only and does not impose an auditable requirement.	Not applicable
Figure 2	**Map of Curtis Island Environmental Management Precinct** This Figure is for reference purposes only (i.e. an assessment of compliance is not required).	Not applicable	Not applicable	Not applicable	The Auditor has not counted Figure 2 as a condition in the total number of conditions. Figure 2 is for reference purposes only and does not impose an auditable requirement.	Not applicable

Appendix B:
Audit Scope, Criteria and Methodology

This Appendix includes relevant email correspondence between Santos GLNG and the Department regarding approved extensions of time to submit this audit report. Refer to Approval condition 56.

OFFICIAL

Australian Government
Department of Climate Change, Energy, the Environment and Water

Our ref: EPBC 2008/4057

[redacted]
Senior Environmental Adviser –
Eastern Queensland and NSW
32 Turbot Street,
BRISBANE QLD 4000

Dear [redacted]

Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project
EPBC 2008/4057

I am writing in relation to the Development of a Natural Gas Liquefaction Park project, which was approved on 22 October 2010 under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), with 74 conditions of approval (EPBC 2008/4057).

As a delegate of the Minister for Environment and Water, I request that an independent audit of compliance with the conditions of the EPBC 2008/4057 approval be undertaken.

Condition 57 of the approval states that on the request of and within a period specified by the department, the proponent must ensure that an independent audit of compliance with these conditions is conducted and an audit report, which addresses the audit criteria to the satisfaction of the department is published on the internet and submitted to the department.

The scope of the audit must relate to activities undertaken for the project during the period from 11 April 2022 to the date of this letter, and in relation with conditions of the approval.

I request that you provide the name and qualifications of the proposed auditor to the department no later than 4 April 2025. It is your responsibility to ensure the auditor is independent as defined by your conditions of approval and in accordance with the attached Independent Audit and Audit Report Guidelines.

If you have any questions regarding this matter, please contact Keith Horwood at audit@dcceew.gov.au.

Yours sincerely

Helen Hodgkins
A/g Director Environmental Audit
Compliance and Enforcement Branch
31 January 2025

Attachments:
Attachment A – EPBC 2008/4057 conditions of approval
Attachment B – Independent Audit and Audit Report Guidelines

DCCEEW.gov.au
John Gorton Building, King Edward Terrace, Parkes ACT 2600 Australia
GPO Box 3090 Canberra ACT 2601 ABN: 63 573 932 849

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Australian Government
Department of Climate Change, Energy, the Environment and Water

Our reference: EPBC 2008/4057

[redacted]
Senior Environmental Adviser
Eastern Queensland and NSW
32 Turbot Street
BRISBANE QLD 4000

Dear [redacted]

Approval of Audit Criteria and Methodology - Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project - EPBC 2008/4057

I refer to your correspondence dated 27 June 2025, submitting the audit criteria and methodology for the independent audit of the Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project (EPBC 2008/4057). I note the project was approved under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) on 22 October 2010.

I approve the audit criteria and methodology prepared by Kurt Hammerschmid and Adam Jones, and request that you submit the independent audit report to the Department of Climate Change, Energy, the Environment and Water by no later than 9 February 2026. If this timeframe cannot be met, you may request an extension from the department up to 30 working days of the due date. I look forward to receiving a copy of the audit report.

If you have any questions regarding this matter, please contact Keith Horwood at audit@dcceew.gov.au.

Yours sincerely

Kim Morgan
A/g Director Environmental Audit
Compliance and Enforcement Branch
25 July 2025

DCCEEW.gov.au
John Gorton Building, King Edward Terrace, Parkes ACT 2600 Australia
GPO Box 3090 Canberra ACT 2601 ABN: 63 573 932 849

OFFICIAL

From: [redacted]@santos.com>
Sent: Monday, 19 January 2026 1:46 PM
To: Audit <audit@dcceew.gov.au>
Cc: [redacted]@santos.com>; [redacted]@santos.com>
Subject: Request for Extension – Independent Audit Report Submission (EPBC 2008/4057)

Dear Keith,

I am writing in relation to the independent audit report for the Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project (EPBC 2008/4057).

We are currently finalising the audit report; however, it has become clear that we will require additional time to complete the remaining tasks to an adequate standard. As outlined in the Department's correspondence dated 25 July 2025, we wish to request an extension of 30 working days from the original due date of 9 February 2026.

This extension will ensure we can finalise the audit documentation thoroughly and provide a high-quality submission to the Department.

Please let us know if any additional information is required to support this request.

Best regards,

[redacted]
Compliance Advisor

Eastern AU & PNG EHSR
Santos
[redacted]@santos.com
Santos.com | Follow us on LinkedIn, Facebook and Twitter

Santos acknowledges the Traditional Owners and Custodians of the lands on which we operate. We pay our respects to their Elders past, present and emerging.

From: Audit <Audit@dcceew.gov.au>
Sent: Tuesday, 20 January 2026 12:14
To: [redacted]@santos.com>; Audit <Audit@dcceew.gov.au>
Cc: [redacted]@santos.com>; [redacted]@santos.com>
Subject: ![EXT]: RE: Request for Extension – Independent Audit Report Submission (EPBC 2008/4057) [SEC=OFFICIAL]

Right-click or tap and hold here to download pictures. To help protect your privacy, Outlook prevented automatic download of this picture from the Internet.

OFFICIAL

Hi [redacted]

Thank you for your email requesting an extension of 30 business days to submit the audit report to the department.

The department approves the request, and the independent audit report is now due by 24 March 2026.

If you have any questions, please feel free to contact me.

Kind regards
Keith

Keith Horwood
Environmental Audit Section
Compliance and Enforcement Branch | Environmental Permitting and Compliance Division
Ngunnawal and Ngambri Country, John Gorton Building, King Edward Terrace, Parkes ACT 2600 Australia
Department of Climate Change, Energy, the Environment and Water
E Audit@dcceew.gov.au
DCCEEWgov.au ABN 63 573 932 849

Acknowledgement of Country
Our department recognises the First Peoples of this nation and their ongoing connection to culture and country. We acknowledge Aboriginal and Torres Strait Islander Peoples as the Traditional Owners, Custodians and Lore Keepers of the world's oldest living culture and pay respects to their Elders past, present and emerging.

OFFICIAL

From: [redacted]@santos.com>
Sent: Tuesday, 20 January 2026 13:07
To: Audit <Audit@dcceew.gov.au>
Cc: [redacted]@santos.com>; [redacted]@santos.com>
Subject: RE: Request for Extension – Independent Audit Report Submission (EPBC 2008/4057) [SEC=OFFICIAL]

Dear Keith,

Thank you very much for your prompt response and for approving our request for an extension. We truly appreciate your understanding and support. We will make sure to submit the independent audit report by the new deadline of 24 March 2026.

Best regards,

[redacted]
Compliance Advisor

Eastern AU & PNG EHSR
Santos
[redacted]@santos.com

![EXT]: RE: Request for Extension – Independent Audit Report Submission (EPBC 2008/4057) [SEC=OFFICIAL]

A Audit <Audit@dcceew.gov.au>
To [redacted]; Audit
Cc [redacted]

Reply | Reply All | Forward | ...
Thu 19/03/2026 3:31 PM

Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

To: Audit <Audit@dcceew.gov.au>
Cc: [redacted]@santos.com>; [redacted]@santos.com>
Subject: RE: Request for Extension – Independent Audit Report Submission (EPBC 2008/4057) [SEC=OFFICIAL]

OFFICIAL

Hi Keith,

The Auditor is still finalising the report (expecting it today) which is due to the department on 24 March. I am seeking a two-week extension (7 April) to allow for Santos to review before the auditor can finalise. I don't think that I will need the full two weeks.

Thanks in advance.

[redacted]

[redacted]
Acting Team Leader Environment - Eastern Queensland and NSW

Eastern AU & PNG EHSR
Santos
[redacted]@santos.com
Santos.com | Follow us on LinkedIn, Facebook and Twitter

Santos acknowledges the Traditional Owners and Custodians of the lands on which we operate. We pay our respects to their Elders past, present and emerging.

![EXT]: RE: Request for Extension – Independent Audit Report Submission (EPBC 2008/4057) [SEC=OFFICIAL]

A Audit <Audit@dcceew.gov.au>
To [redacted] Audit
Cc [redacted]

Reply | Reply All | Forward | ...
Thu 19/03/2026 3:31 PM

Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

OFFICIAL

Hi [redacted]

Thank you for letting us know in advance of the due date.

The department approves the request for the extension of time to provide the audit report. We look forward to receiving a copy of the audit report by **7 April 2026**.

Kind regards
Keith

Keith Horwood
Environmental Audit Section
Compliance and Enforcement Branch | Environmental Permitting and Compliance Division
Ngunnawal and Ngambri Country, John Gorton Building, King Edward Terrace, Parkes ACT 2600 Australia
Department of Climate Change, Energy, the Environment and Water
E Audit@dcceew.gov.au
DCCEEW.gov.au ABN 63 573 932 849

Acknowledgement of Country
Our department recognises the First Peoples of this nation and their ongoing connection to culture and country. We acknowledge Aboriginal and Torres Strait Islander Peoples as the Traditional Owners, Custodians and Lore Keepers of the world's oldest living culture and pay respects to their Elders past, present and emerging.

Appendix C:
Approval of Auditors

OFFICIAL

Australian Government
Department of Climate Change, Energy, the Environment and Water

Our ref: EPBC 2008/4057

[redacted]
Senior Environmental Adviser
Eastern Queensland and NSW
32 Turbot Street
BRISBANE QLD 4000

Dear [redacted]

Approval of Independent Auditors - Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project - EPBC 2008/4057

I refer to your correspondence dated 19 March 2025, nominating the audit team of Kurt Hammerschmid and Adam Jones for the independent audit of the Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project (EPBC 2008/4057).

The Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project was approved under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) on 22 October 2010.

I approve the independent auditors, Kurt Hammerschmid and Adam Jones, to conduct the independent audit required under condition 57 of the EPBC 2008/4057 approval. I request that you submit the proposed audit criteria to the Department of Climate Change, Energy, the Environment and Water (department) no later than 21 May 2025. I look forward to receiving a copy of the audit criteria.

If you have any questions regarding this matter, please contact Keith Horwood at audit@dcceew.gov.au.

Yours sincerely

Thomas Long
Director Environmental Audit
Compliance and Enforcement Branch
24 March 2025

DCCEEW.gov.au
John Gorton Building, King Edward Terrace, Parkes ACT 2600 Australia
GPO Box 3090 Canberra ACT 2601 ABN: 63 573 932 849

OFFICIAL

Appendix D:
Auditors' Declarations of Independence

I, [*name of auditor*[1]] Kurt Paul Hammerschmid of [*name of organisation and full address*] [redacted] Sorrento Victoria 3943

declare that to the best of my knowledge and belief I and my organisation do not have any conflicting or competing interests with:

The Auditee [*name of Auditee*] Santos Limited and PETRONAS Australia Pty Limited, the Auditee's staff or representatives or other persons associated with the Auditee, including any personal, financial, business or employment relationship, except to the extent detailed below.

The project to be audited [*name of EPBC Act project*] Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project EPBC No. 2008/4057.

I shall notify the Department of the Environment within seven days of any change in these circumstances or any other change that may affect my independent status.

I shall at all times observe any professional code of conduct and/or ethics applicable to undertaking audits (i.e. – as prescribed by the agency with which I hold accreditation/membership). I take full responsibility for any factual inaccuracy or mistake made in giving this declaration, particularly to the extent that others rely upon the truth of this declaration. I acknowledge that the Department of the Environment may request further information to verify my independence at any time.

Details of any personal, financial, business or employment relationship with the Auditee, the Auditee's staff, representatives or associated persons. (This is in the context of both the person making the declaration and the organisation that they are employed by – specify 'nil' if none):
Nil.

Details of any personal, financial, business or employment relationship with the project to be audited. (This is in the context of both the person making the declaration and the organisation that they are employed by - specify 'nil' if none):
Nil.

Details of audit qualifications and professional accreditations/memberships. (Include copies of current audit qualifications and current professional accreditations/memberships) :

Bachelor of Applied Science (Chemistry) - University of Canberra (1986)
Master of Science (by research) - Macquarie University (1992)
Full Member - Environment Institute Australia and New Zealand (Reg. No. 215817)
ABRS Company Director Registration No. 036 90606 73684 03 (November 2022)

In making this declaration, I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both. An extract of section 491 of the EPBC Act is attached

Signed

Full name (please print) Kurt Paul Hammerschmid

Organisation (please print) Integrated Environmental Systems Pty Ltd

Date 14 / 03 / 2025

Footnote:

1. Where an organisation or a team of auditors is nominated to undertake the audit, each individual that is nominated is to complete a separate declaration.
2. The curriculum vitaes of all audit team members are to be submitted with the declaration outlining their relevant experience and qualifications.

I, [*name of auditor*[1]] Adam Paul Jones of [*name of organisation and full address*] Suite 503, 9-13 Bronte Road, Bondi Junction NSW 2022

declare that to the best of my knowledge and belief I and my organisation do not have any conflicting or competing interests with:

The Auditee [*name of Auditee*] Santos Limited and PETRONAS Australia Pty Limited, the Auditee's staff or representatives or other persons associated with the Auditee, including any personal, financial, business or employment relationship, except to the extent detailed below.

The project to be audited *[name of EPBC Act project]* Development of a Natural Gas Liquefaction Park associated with the Gladstone LNG Project EPBC No. 2008/4057.

I shall notify the Department of the Environment within seven days of any change in these circumstances or any other change that may affect my independent status.

I shall at all times observe any professional code of conduct and/or ethics applicable to undertaking audits (i.e. – as prescribed by the agency with which I hold accreditation/membership). I take full responsibility for any factual inaccuracy or mistake made in giving this declaration, particularly to the extent that others rely upon the truth of this declaration. I acknowledge that the Department of the Environment may request further information to verify my independence at any time.

Details of any personal, financial, business or employment relationship with the Auditee, the Auditee's staff, representatives or associated persons. (This is in the context of both the person making the declaration and the organisation that they are employed by – specify 'nil' if none):
Nil.

Details of any personal, financial, business or employment relationship with the project to be audited. (This is in the context of both the person making the declaration and the organisation that they are employed by - specify 'nil' if none):
Nil.

Details of audit qualifications and professional accreditations/memberships. (Include copies of current audit qualifications and current professional accreditations/memberships) :

Lead Auditor Integrated Management Systems (Exemplar Global): Auditor Training Online (2024)
Graduate Certificate of Environment: Macquarie University (2021)
Solicitor of the Supreme Court of New South Wales (admitted in 1993)
Bachelor of Commerce (Marketing & Hospitality Management): University of NSW (1995)
Bachelor of Economics (majoring in Finance) with Bachelor of Laws: Macquarie University (1992)
Australian Practising Certificate (Principal of a Law Practice) issued by Law Society of NSW (current)
Solicitor Member: Law Society of NSW (current)

In making this declaration, I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both. An extract of section 491 of the EPBC Act is attached

Signed AJones

Full name (please print) Adam Paul Jones

Organisation (please print) Contractor to Integrated Environmental Systems Pty Ltd

Date 11 / 03 / 2025

Footnote:

1. Where an organisation or a team of auditors is nominated to undertake the audit, each individual that is nominated is to complete a separate declaration.
2. The curriculum vitaes of all audit team members are to be submitted with the declaration outlining their relevant experience and qualifications.

Appendix E:
Auditors' Certifications

<u>Auditor's name, position, company and contact details:</u>

Kurt Paul Hammerschmid, Lead Auditor

Integrated Environmental Systems Pty Ltd

PO Box 323, Sorrento Victoria 3943

<u>Auditor's qualifications and/or experience:</u>

Bachelor of Applied Science (Chemistry) – University of Canberra (1986)

Master of Science (by research) – Macquarie University (1992)

Full Member – Environment Institute Australia and New Zealand (Reg. No. 215817)

ABRS Company Director Registration No. 036 90606 73684 03 (November 2022)

<u>Auditor's declaration:</u>

I, Kurt Paul Hammerschmid (name of auditor)

- For environmental audits that are required by a condition of an *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval I certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct and complete.

I am aware that section 491 of the EPBC Act makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both.

- ~~For directed environmental audits that are required pursuant to section 458 of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) I certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct and complete.~~

~~I am aware that section 461(4) of the EPBC Act makes it an offence in certain circumstances for an environmental auditor to include a statement in an audit report that is false or misleading in a material particular. The offence is punishable on conviction by imprisonment for not more than 6 months.~~

Signature: Kt Hammerschmid

Date: 7 April 2026

Note: Modify the auditor's certification to reflect whether the environmental audit was required by a condition of an EPBC Act approval or directed pursuant to section 458 of the EPBC Act.

Auditor’s name, position, company and contact details:

Adam Paul Jones, Auditor

Contractor to Integrated Environmental Systems Pty Ltd

Suite 503, 9-13 Bronte Road, Bondi Junction NSW 2022

Auditor’s qualifications and/or experience:

Lead Auditor Integrated Management Systems (Exemplar Global): Auditor Training Online (2024)

Graduate Certificate of Environment: Macquarie University (2021)

Solicitor of the Supreme Court of New South Wales (admitted in 1993)

Bachelor of Commerce (Marketing & Hospitality Management): University of NSW (1995)

Bachelor of Economics (majoring in Finance) with Bachelor of Laws: Macquarie University (1992)

Australian Practising Certificate (Principal of a Law Practice) issued by Law Society of NSW (current)

Solicitor Member: Law Society of NSW (current)

Auditor’s declaration:

I, Adam Paul Jones (name of auditor)

- For environmental audits that are required by a condition of an Environment Protection and Biodiversity *Conservation Act 1999* (EPBC Act) approval I certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct and complete.

I am aware that section 491 of the EPBC Act makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both.

- ~~For directed environmental audits that are required pursuant to section 458 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) I certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct and complete.~~

~~I am aware that section 461(4) of the EPBC Act makes it an offence in certain circumstances for an environmental auditor to include a statement in an audit report that is false or misleading in a material particular. The offence is punishable on conviction by imprisonment for not more than 6 months.~~

Signature: 

Date: 7 April 2026

Note: Modify the auditor’s certification to reflect whether the environmental audit was required by a condition of an EPBC Act approval or directed pursuant to section 458 of the EPBC Act.

Appendix F:
Proponent's Response to Recommendations

This Appendix was prepared for the purpose of satisfying the requirement in Approval condition 59(f), for this audit report to include a response by the Proponent to the recommendations in the report.

In this audit report, the Auditors' 'recommendations' comprise:

- a recommendation for each of the three identified 'non-compliance' audit findings; and
- 15 observations made in accordance with the *Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of the Environment Protection and Biodiversity Conservation Act 1999,* issued in 2019 by the Department of Climate Change, Energy, the Environment and Water.

Santos GLNG prepared and provided the 'Proponent's Response' information (marked in blue) in the following tables, in response to the Auditors' 'recommendations' in the revised draft version of this audit report issued on 19 March 2026. The final version of this audit report, issued on 7 April 2026, maintained the same non-compliance recommendations and observations as included in the revised draft version of this report.

Proponent's Response to 'Non-compliance' Recommendations

Audit Finding (Non-compliance)	Auditors' Recommendation (Non-compliance)	Proponent's Response
Non-compliance No. 1 – Condition 55 (Compliance with State environmental and other authorities) – By letter of 14 May 2024, the then Queensland Department of Environment, Science and Innovation (DESI) notified Santos GLNG of a non-compliance against condition A15 of Queensland Environmental Authority No. EPPG00712213 (EA), regarding the requirement for Santos GLNG to obtain DESI's acceptance of the nominated third party auditor for an EA audit which was conducted in July 2023.	**Recommendation No. 1** – Condition 55 (Compliance with State environmental and other authorities) – Santos GLNG should review its administrative processes in relation to the identified non-compliance against EA condition A15.	Santos GLNG has already put in place protocols to ensure that before conducting any audit for the EA, the auditor is accepted by the Queensland Department of the Environment, Tourism, Science and Innovation (DETSI), to ensure compliance with condition A15 of the EA going forward. For example, Santos GLNG has obtained written approval from DETSI for the auditor to undertake the 2026 EA Third Party Audit.
Non-compliance No. 2 – Condition 67(c) (Annual Environmental Return) – The LNG Facility 2024 Annual Return did not identify the non-compliance against Approval condition 55 which resulted from the non-compliance against EA condition A15 which was notified by letter of 14 May 2024 from the then Queensland Department of Environment, Science and Innovation to Santos GLNG.	**Recommendation No. 2** – Condition 67(c) (Annual Environmental Return) – Santos GLNG should ensure that any non-compliance identified against an EA condition is also identified in the relevant LNG Facility Annual Return.	Santos GLNG has put in place protocols to ensure future compliance with this condition.
Non-compliance No. 3 – Condition 70 (Publication of Plans) – As of 4 December 2025 (the end of the audit period), the current approved Long-Term Turtle Management Plan (Revision 6, April 2024) was not published on the Santos GLNG website. The Auditor acknowledges that: • as of 4 December 2025, an obsolete approved version (Revision 4, June 2015) of the Long-Term Turtle Management Plan was published on the Santos GLNG website; and • on 3 February 2026, Santos GLNG published the current approved Long-Term Turtle Management Plan (Revision 6, April 2024) on the Santos GLNG website.	**Recommendation No. 3** – Condition 70 (Publication of Plans) – Santos GLNG should review its administrative processes to ensure future compliance with this condition.	The Santos GLNG website has been updated to include the current approved Long-Term Turtle Management Plan (Revision 6, April 2024). GLNG has put in place protocols to ensure future compliance with this condition.

Proponent's Response to Observations

Auditors' Recommendation (Observation)	Proponent's Response
Observation No. 1 – Condition 3 (Conduct of construction and operation workforce) – Santos GLNG should revise the content relating to private vehicles and private watercraft in the GLNG Environmental Code of Conduct, to accurately reflect the wording of condition 3. Section 2.1 in the current GLNG Environmental Code of Conduct refers to "without written authorisation from GLNG management", which is not present in condition 3.	**Observation accepted** The LNG Facility Environmental Protection Code of Conduct was approved by the Minister on 10/2/2016. At that time, the Minister found the Code to meet the requirements of condition 3 of the EPBC approval 2008/4057. Santos GLNG will revise the Code to reflect the operational phase of the facility and the wording in condition 3. The revised Code will be submitted to the Minister for approval in accordance with condition 8 of EPBC approval 2008/4057.
Observation No. 2 – Condition 5 (Conduct of construction and operation workforce) – Santos GLNG could review Figure 1 (Curtis Island Environmental Management Precinct) in the GLNG Environmental Code of Conduct for consistency with: a) Figure 2 (Map of Curtis Island Environmental Management Precinct) of the Approval; and b) the CIEMP as identified in the August 2013 Monte Christo Offset Proposal (Ecofund Qld Pty Ltd). For example, discrepancies exist along the southern and western boundary, between the Precinct boundary identified in Figure 1 of the Code, against the Precinct boundary identified in Figure 2 of the Approval. A discrepancy could result in uncertainty regarding whether CIEMP access requirements apply at a particular location.	**Observation accepted** Santos GLNG will revise the mapping in the Code to ensure consistency with EPBC approval 2008/4057.
Observation No. 3 – Condition 5 (Conduct of construction and operation workforce) – Santos GLNG could request the current manager of the CIEMP (QPWS) to issue written authorisation with the manager's consent for entry (for a suitable defined period) of GLNG employees and contractors for specified defined purposes (e.g. environmental monitoring, firefighting) which relate to the operational phase of the LNG Facility.	**Observation noted** EPBC approval 2008/4057 requires prior authorisation (in writing) from QPWS before entering the CIEMP.
Observation No. 4 – Condition 6 (Conduct of construction and operation workforce) – Santos GLNG should ensure that Appendix A (Approval Conditions relating to the GLNG Environmental Code of Conduct) in a future revision of the GLNG Environmental Code of Conduct, includes the full text of Approval condition 6; i.e. paragraphs (a) to (d) are currently omitted.	**Observation accepted** Santos GLNG will revise the LNG Facility Environmental Protection Code of Conduct to reflect the wording in condition 6 of the EPBC approval 2008/4057. The revised Code will be submitted to the Minister for approval in accordance with condition 8 of the approval. The LNG Facility Environmental Protection Code of Conduct was approved by the Minister on 10/2/2016. At that time, the Minister found the Code to meet the requirements of condition 6 of the EPBC approval 2008/4057.
Observation No. 5 – Condition 6 (Conduct of construction and operation workforce) – Santos GLNG could enable persons who have completed the GLNG DSO Site Induction to download and save the course for later reference. At present, the only means by which an inducted person can access information presented in the course is to repeat the induction.	**Observation noted** Santos GLNG will investigate this observation.
Observation No. 6 – Condition 6(c) (Conduct of construction and operation workforce) – Santos GLNG could revise the GLNG DSO Site Induction to include a specific 'Responsibilities' section to directly address the requirement in this condition element to explain responsibilities of Santos GLNG, employees and sub-contractors within and in relation to the identified terrestrial and marine areas.	**Observation noted** Santos will revise the Code to address this observation.
Observation No. 7 – Condition 11 (third element) (Conduct of construction and operation workforce) – Santos GLNG could demonstrate improved implementation of the GLNG Environmental Code of Conduct (Code) by including the content of the Code in: • the GLNG DSO Site Induction – this induction does not identify which parts of the induction relate to the Code; and • the Environmental Training Awareness Package – Version 3 of the package refers to the Code (in slides 4 and 25) but does not identify which parts of the Package relate to the Code.	**Observation accepted** Santos GLNG will review the Site Induction and the Environmental Training Awareness package to identify the sections applicable to the Code.

Auditors' Recommendation (Observation)	Proponent's Response
Observation No. 8 – Condition 15(c) (Plan to secure and manage environmental offsets) – Santos GLNG should record that Table 1 (EPBC Act approvals compliance matrix) in the August 2013 Monte Christo Offset Proposal includes inaccurate wording for GLNG Approval condition 15(c). For example, the Table 1 entry omits the Approval condition 15(c) references to "(indexed at CPI)".	**Observation noted** The Monte Christo property proposal is to offset direct impacts on biodiversity values. Condition 15 c of the approval is to offset indirect impacts on biodiversity values through an annual payment (indexed at CPI) which is provided annually to the Australian and Queensland government's joint program of field management for the GBR World Heritage Area.
Observation No. 9 – Condition 28 (second element) (Construction and operation environmental management requirements and plans) – Santos GLNG should review its current internal and contractor workflows, and verify that suitable measures (i.e. hold-points) are in place to prevent a similar 'timing' non-compliance in the future.	**Observation accepted** Santos GLNG will review the OEMP in response to this observation.
Observation No. 10 – Condition 28 (third element) (Construction and operation environmental management requirements and plans) – Santos GLNG should ensure that the next revision of the August 2015 OEMP excludes potentially obsolete content (e.g. relating to a groundwater monitoring program) which based on a current risk assessment, may not apply to the operational phase of the LNG Facility.	**Observation accepted** Santos GLNG will review the OEMP in response to this observation.
Observation No. 11 – Condition 31 (third element) (Quarantine Management Plan) – Santos GLNG should submit for the Minister's approval, a revised Biosecurity Management Plan (to be defined as and satisfy the requirements in conditions 30(a) to 30(h) for a Quarantine Management Plan) which reflects the current operational phase of the LNG Facility.	**Observation accepted** Santos will review the Biosecurity Management Plan in response to this observation.
Observation No. 12 – Condition 32(c) (Environmental Management Plan – Water Mouse (Xeromys myoides) – Santos GLNG should incorporate relevant water mouse habitat mitigation measures into a future revision of the OEMP; for example, via inclusion of a Water Mouse Habitat Management Sub-Plan in the relevant 'Water Mouse' section of a revised OEMP.	**Observation accepted** Santos GLNG will review the OEMP in response to this observation.
Observation No. 13 – Condition 33 (second element) (Environmental Management Plan – Water Mouse (Xeromys myoides) – At a suitable time during the operational phase of the LNG Facility, Santos GLNG could commission a new water mouse survey and water mouse habitat assessment to verify whether the outcomes identified in the May 2012 Water Mouse Survey report still remain valid.	**Observation not applicable** The 2012 Water Mouse Survey report concluded that no further actions were required.
Observation No. 14 – Condition 45 (Request for variation of plans by proponent) – Santos GLNG should consider relevant requirements in the Department's "Environmental management plan guidelines" (currently, Version 1.2, 2024) when preparing a revised plan under this Approval.	**Observation noted** Santos GLNG will consider this observation when preparing revised plans.
Observation No. 15 – Condition 67(b) (Annual Environmental Return) – Santos GLNG could schedule and retain records of periodic field-based assessments of the effectiveness of mitigation measures applied to avoid an adverse impact on Matters of National Environmental Significance (MNES). For example, Santos GLNG could assess whether an applied mitigation measure for a potential adverse impact on MNES reduces the residual risk of the potential adverse impact either to a lower residual risk status or 'As Low As Reasonably Practicable'.	**Observation noted** Santos GLNG will review the OEMP in response to this observation.