



## ENVIRONMENTAL ANNUAL RETURN – ANNUAL COMPLIANCE REPORT

### EPBC 2018/8276- SURAT BASIN ACREAGE DEVELOPMENT

The Surat Basin Development Project (Surat North Project), which authorises the development of approximately 740 Coal Seam Gas (CSG) production wells and associated infrastructure within the Project area was approved by the Department of Agriculture, Water and the Environment (DAWE) (**the Department**), on 9 December 2019.

Under EPBC approval 2018/8276 (**the Approval**), the holder of the approval is required to publish an Annual Return addressing compliance with the below conditions on its website within three months of every anniversary of the commencement of the action.

This document is QGC’s Annual Return for referral approval EPBC 2018/8276 – Surat Basin Development for the period from 05 March 2020 to 05 March 2021 (**the Reporting Period**).

Condition 40 of the approval requires that a **compliance report** be submitted to the Minister at each 12-month period following the date of **commencement of the action**. The approval holder must:

- a. publish each **compliance report** on the **website** within 60 **business days** following the relevant 12 month period;
- b. notify the **Department** by email that a **compliance report** has been published on the **website** and provide the weblink for the **compliance report** within five **business days** of the date of publication;
- c. keep all **compliance reports** publicly available on the **website** until this approval expires;
- d. exclude or redact **sensitive ecological data** from **compliance reports** published on the **website**; and
- e. where any **sensitive ecological data** has been excluded from the version published, submit the full **compliance report** to the **Department** within five **business days** of publication.

Note 5: Compliance reports may be published on the Department's website.

As per **the Approval**, **Compliance reports** means written reports:

- i. providing accurate and complete details of compliance, **incidents**, and non-compliance with the conditions and the **plans**;
- ii. consistent with the **Department's Annual Compliance Report Guidelines (2014)**;
- iii. include a **shapefile** of any clearance of any **protected matters**, or their habitat, undertaken within the relevant 12 month period; and
- iv. annexing a schedule of all **plans** prepared and in existence in relation to the conditions during the relevant 12 month period.

This report complies with the above requirements. **Appendix A** provides information regarding requirements i, ii and iv, as per above. The information as per requirement iii is provided to **the Department** in conjunction with this report. **Appendix B** provides a list of environmental management plans.

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## 1.0 BACKGROUND

### 1.1 The Surat Basin Acreage Development Project

The Surat Basin Acreage Development Project (SBAD Project) involves development of new coal seam gas (CSG) fields in Queensland's northern Surat Basin. The Project area lies approximately 20km west of Wandoan, 35km south-west of Taroom, and 16 km north of Woleebee.

The infrastructure project involves:

- Coal seam gas production wells with associated infrastructure including gas and water gathering lines;
- Ancillary and support infrastructure including access roads, electrical supply infrastructure, communications, laydown areas, borrow pits and temporary camps.

### 1.2 Project Activities during the Reporting Period

QGC commenced activities under this approval on the 05 March 2020 and these activities include well access and gathering, and incidental activities to support construction and operations.

## 2.0 EPBC APPROVAL ASSESSMENT OF COMPLIANCE

In compiling this annual return, QGC has identified instances of non-compliances with the conditions of EPBC approval 2018/8276 within **the Reporting Period**. **Appendix A** provides details of compliance with each of the approval conditions.



**APPENDIX A - Surat Basin Acreage Project Area – EPBC 2018/8276 – Assessment of  
Compliance with Conditions**



Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non- Compliant/ Not applicable															
<b>Project Area</b>																		
1.	For the purpose of the action, the approval holder must not take any action outside the project area.	No works have been undertaken outside of the of the project area during <b>the Reporting Period</b> . The Upstream Delivery Process (UDP) has been followed.	Compliant															
<b>Disturbance Limits</b>																		
2.	The approval holder must not <b>clear</b> more than: <ul style="list-style-type: none"> <li>a) 80 ha of <b>South-eastern Long-eared Bat (<i>Nyctophilus corbeni</i>) habitat.</b></li> <li>b) 62 ha of <b>Koala (<i>Phascolarctos cinerus</i>) (combined populations of Qld, NSW and the ACT) habitat.</b></li> <li>c) 62 ha of <b>Greater Glider (<i>Petauroides volans</i>) habitat.</b></li> <li>d) 9 ha of <b>Brigalow (<i>Acacia harpophylla</i> dominant and co-dominant) threatened ecological community.</b></li> </ul>	QGC provides the following disturbance data for the <b>Reporting Period</b> . <table border="1" style="margin-top: 10px; width: 100%;"> <thead> <tr> <th style="text-align: center;">As per Condition 2</th> <th style="text-align: center;">Fauna Name / Disturbance Type</th> <th style="text-align: center;">Total Area (Ha)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">a)</td> <td>South-eastern Long-eared Bat</td> <td style="text-align: center;">16.096</td> </tr> <tr> <td style="text-align: center;">b)</td> <td>Koala</td> <td style="text-align: center;">17.244</td> </tr> <tr> <td style="text-align: center;">c)</td> <td>Greater Glider</td> <td style="text-align: center;">16.083</td> </tr> <tr> <td style="text-align: center;">d)</td> <td>Brigalow TEC</td> <td style="text-align: center;">0.005</td> </tr> </tbody> </table>	As per Condition 2	Fauna Name / Disturbance Type	Total Area (Ha)	a)	South-eastern Long-eared Bat	16.096	b)	Koala	17.244	c)	Greater Glider	16.083	d)	Brigalow TEC	0.005	Compliant
As per Condition 2	Fauna Name / Disturbance Type	Total Area (Ha)																
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b)	Koala	17.244																
c)	Greater Glider	16.083																
d)	Brigalow TEC	0.005																
<b>Pre-clearance Surveys</b>																		
3.	The approval holder must undertake pre-clearance surveys of areas to be <b>cleared</b> prior to <b>clearing</b> .	Pre-clearance surveys were undertaken prior to areas being cleared through baseline surveys and front-end and ecology surveys.	Compliant															
4.	Pre-clearance surveys must be undertaken by a <b>suitably qualified field ecologist</b> and undertaken in accordance with <b>the Department's Survey Guidelines</b> in effect at the time of the pre-clearance survey or other survey methodology endorsed by <b>the Department</b> in writing.	Pre-clearance surveys have been undertaken by suitably qualified ecologists (suitably qualified persons (SQP)). All QGC Ecologists on the project have SQP verification.  Pre-clearance surveys have been undertaken as described in the Significant Species Management Plan (SSMP) approved in February 2021 (refer to	Compliant															



Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non-Compliant/ Not applicable
		Appendix B). This plan requires that pre-clearance surveys be undertaken by suitably qualified ecologists in accordance with the relevant DAWE guidelines. The Environmental Field Constraints Assessment Guideline is in place and QGC pre-clearance surveys are completed in accordance with this guideline.	
5.	The results of pre-clearance surveys must be presented in pre-clearance survey reports. Each pre-clearance survey report which demonstrates a potential <b>impact to listed threatened species and communities</b> as a result of <b>clearing</b> must be published on the <b>website</b> within 6 months of completion and remain published on the <b>website</b> for the period of approval. The approval holder must notify the <b>Department</b> within five <b>business days</b> of publishing each pre-clearance survey report.	Not all relevant pre-clearance surveys have been published on the Shell QGC external website.  QGC has a plan to publish these pre-clearance surveys on QGC’s external website by Q2 2021.	Non-Compliant
<b>Listed Threatened Species and Communities Management Plans</b>			
6	The approval holder must manage <b>impacts to listed threatened species and communities</b> that are known to occur within the <b>project area</b> in accordance with the <b>Significant Species Management Plan (SSMP)</b> .	Potential impacts to listed threatened species and communities are managed through the Significant species Management Plan (refer to Appendix B). This plan was approved on 23 January 2020 and then reviewed and updated to include all gasfield SSMPs into a single document. The updated SSMP was approved on 09 February 2021.	Compliant
7.	If a <b>listed threatened species or community</b> which are not addressed in the <b>SSMP</b> are identified in the <b>project area</b> , the approval holder must revise the <b>SSMP</b> to include management measures to avoid and/or mitigate <b>impacts</b> to that <b>listed threatened species or community</b> and submit, within 3 months of identifying this <b>listed</b>	The management measures outlined in the SSMP specify the requirement to develop an SSMP should an additional species be encountered during field surveys, clearing or construction and the process and timelines for doing so.	Compliant



Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non-Compliant/ Not applicable
	<p><b>threatened species or community</b>, a copy of the revised <b>SSMP</b> to the <b>Minister</b> for written approval. The approved revised <b>SSMP</b> must be implemented.</p>		
8.	<p>The approval holder must manage to reduce/minimise <b>impacts to listed threatened species and communities</b> from pest and weed species in accordance with the <b>Biosecurity Control Manual</b>.</p>	<p>All biosecurity matters and actions are undertaken in accordance with the <b>Department</b> approved Biosecurity Manual (QCQGC-BX00-ENV-MAN-000002 Rev 05) (refer to Appendix B).</p>	Compliant
9.	<p>The approval holder must undertake the action in accordance with the <b>Reinstatement and Rehabilitation Manual</b>.</p>	<p>Reinstatement and Rehabilitation (QCQGC-BX00-ENV-MAN-000005 Rev 03) (refer to Appendix B).</p>	Compliant
10.	<p>The approval holder must undertake the action in accordance with the <b>Constraints Planning and Field Development Protocol</b>.</p>	<p>Undertaken in accordance with Surat Basin Acreage Constraints Planning and Field development Protocol Rev 7 (approved 04 January 2020) (refer to Appendix B).</p>	Compliant
<b>Environmental Offsets</b>			
11.	<p>The approval holder must prepare an Offset Management Plan that details the provision of offsets in accordance with the <b>Offset Assessment Guide values</b>. If offsets in accordance with the <b>Offset Assessment Guide values</b> cannot be provided, an alternative offset or offsets must be proposed. The Offset Management Plan must:</p> <ul style="list-style-type: none"> <li>a) be prepared by a suitably qualified person, and in accordance with the principles of the EPBC Act Environmental Offsets Policy and the Department's Environmental Management Plan Guidelines;</li> <li>b) demonstrate how the offsets compensate for the impacts of the action in accordance with the Offset Assessment Guide values and consistent with the EPBC Act Environmental Offsets Policy;</li> </ul>	<p>The Offset Management Plan (OMP) (refer to Appendix B) was approved by DAWE on 30/11/2020. The OMP was prepared in accordance with the requirements as per Condition 11.</p>	Compliant



Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non-Compliant/ Not applicable
	<p>and</p> <p>c) include, but not be limited to:</p> <p>i. baseline data that validates the habitat quality score of the South-eastern Long-eared Bat (<i>Nyctophilus corbeni</i>) habitat, Koala (<i>Phascolarctos cinereus</i>) (combined populations of Qld, NSW and the ACT) habitat and Greater Glider (<i>Petauroides volans</i>) habitat cleared for the purpose of undertaking Stage 1 in the Offset Assessment Guide values. The approval holder may also elect to provide baseline data that validates the habitat quality score of the South-eastern Long-eared Bat (<i>Nyctophilus corbeni</i>) habitat, Koala (<i>Phascolarctos cinereus</i>) (combined populations of Qld, NSW and the ACT) habitat and Greater Glider (<i>Petauroides volans</i>) habitat cleared for the purpose of undertaking Stage 2 in the Offset Assessment Guide values in the Offset Management Plan;</p> <p>ii. a description of the offsets, including location, size, condition, environmental values present and surrounding land uses;</p> <p>iii. baseline data and other supporting evidence that documents the presence, suitability and baseline quality of the South-eastern Long-eared Bat (<i>Nyctophilus corbeni</i>) habitat, Koala (<i>Phascolarctos cinereus</i>) (combined populations of Qld, NSW and the ACT) habitat and Greater Glider (<i>Petauroides volans</i>) habitat within the offset area/s;</p> <p>iv. maps and shapefiles of the offset area/s;</p>		



Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non-Compliant/ Not applicable
	<ul style="list-style-type: none"> <li>v. specific objectives to demonstrate South-eastern Long-eared Bat (<i>Nyctophilus corbeni</i>) habitat, Koala (<i>Phascolarctos cinereus</i>) (combined populations of Qld,NSW and the ACT) habitat and Greater Glider (<i>Petauroides volans</i>) habitat quality improvement over the life of <b>the Approval</b>;</li> <li>vi. specific management actions, and timeframes for implementation, to be carried out to meet the specific objectives to improve the quality of the South-eastern Long-eared Bat (<i>Nyctophilus corbeni</i>) habitat, Koala (<i>Phascolarctos cinereus</i>) (combined populations of Qld,NSW and the ACT) habitat and Greater Glider (<i>Petauroides volans</i>) habitat within the offset area/s;</li> <li>vii. key performance indicators to demonstrate the improvement to the quality of the South- eastern Long-eared Bat (<i>Nyctophilus corbeni</i>) habitat, Koala (<i>Phascolarctos cinereus</i>) (combined populations of Qld, NSW and the ACT) habitat and Greater Glider (<i>Petauroides volans</i>) habitat within the offset area/s;</li> <li>viii. the nature, timing and frequency of monitoring to determine the success of management actions against key performance indicators;</li> <li>ix. the timing for the provision of an annual monitoring report to the Department. The monitoring report must include data relating to the key performance indicators and provide a table of management measures taken during the previous 12 month period;</li> </ul>		





Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non- Compliant/ Not applicable
	<ul style="list-style-type: none"> <li>x. an assessment of risks that the key performance indicators and/or plan objectives will not be met and identification of the sources of those risks and strategies for managing them;</li> <li>xi. indicative corrective actions that will be implemented in the event monitoring activities indicate key performance indicators are not or are unlikely to be achieved;</li> <li>xii. the roles and responsibilities for implementing the management actions;</li> <li>xiii. evidence of consistency with relevant conservation advices, recovery plans and/or threat abatement plans.</li> </ul>		
<b>12.</b>	The approval holder must not commence clearing of South-eastern Long-eared Bat ( <i>Nyctophilus corbeni</i> ) habitat, Koala ( <i>Phascolarctos cinereus</i> ) (combined populations of Qld, NSW and the ACT) habitat or Greater Glider ( <i>Petauroides volans</i> ) habitat associated with Stage 2 unless the Minister has approved the Offset Management Plan in writing. The approval holder must implement the approved Offset Management Plan.	<p>The Offset Management Plan (OMP) was approved by DAWE on 30 November 2020 (refer to Appendix B).</p> <p>The OMP is currently being implemented.</p>	Compliant
<b>13.</b>	The approval holder must legally secure the offset area/s proposed in the Offset Management Plan approved by the Minister within 9 months of the date of the Minister's approval of the Offset Management Plan.	The OMP was approved on 30 November 2020. Offset area to be secured by 30 September 2021.	Not applicable
<b>14.</b>	If the approval holder did not provide baseline data that validates the habitat quality score of the South-eastern Long-eared Bat ( <i>Nyctophilus corbeni</i> ) habitat, Koala ( <i>Phascolarctos cinereus</i> ) (combined populations of Qld, NSW and the ACT) habitat and Greater Glider ( <i>Petauroides volans</i> ) habitat cleared for the purpose of undertaking Stage 2 in the Offset Assessment Guide values under Condition 11 (c)(i), the	The OMP included baseline data that validates the habitat quality score of the South-eastern Long-eared Bat habitat, Koala habitat and Greater Glider habitat cleared for the purpose of undertaking both Stages 1 and 2.	Not applicable



Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non-Compliant/ Not applicable
	approval holder must, within 50 months of <b>the Approval</b> of the Offsets Management Plan, submit a Revised Offset Management Plan to the Minister for written approval.		
15.	The Revised Offset Management Plan must constitute a revision of the approved Offset Management Plan and include baseline data that validates the habitat quality score of the South- eastern Long-eared Bat ( <i>Nyctophilus corbeni</i> ) habitat, Koala ( <i>Phascolarctos cinereus</i> ) (combined populations of Qld, NSW and the ACT) habitat and Greater Glider ( <i>Petauroides volans</i> ) habitat cleared for the purpose of undertaking Stage 2. If the residual impact of the action on listed threatened species and communities is greater than that predicted in the approved Offset Management Plan, as demonstrated through the habitat quality score of the areas cleared for the purpose of undertaking Stage 2, an offset or offsets to compensate for the additional residual impact must be provided. Any additional offset or offsets must be consistent with the EPBC Act Environmental Offsets Policy. The Minister may request specified changes to the revised Offsets Management Plan and specify a timeframe to make the changes. If the Minister requests changes, the approval holder must make the specified changes to the revised Offsets Management Plan and resubmit it within the specified timeframe. The approval holder must implement that Revised Offset Management Plan.	The OMP included baseline data that validates the habitat quality score of the South-eastern Long-eared Bat habitat, Koala habitat and Greater Glider habitat cleared for the purpose of undertaking both Stages 1 and 2.	Not applicable
16.	The approval holder must legally secure the offset area/s proposed in the approved Revised Offset Management Plan within 12 months of the date of the Minister's approval of the Revised Offset Management Plan.	The OMP was approved on 30/11/2020 with no requirement to prepare a Revised OMP.	Not applicable



Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non- Compliant/ Not applicable
	<p>Note 1 Offsets for some species may be accommodated within ecological communities or overlap State approval requirements or other species habitat requirements, as long as they meet the requirements of these conditions of approval in respect to impacts to each individual listed threatened species and communities being offset.</p> <p>Note 2: The Minister may determine that offsets approved by the Queensland Government satisfy the requirements for offsetting listed threatened species and communities as long as any required offsets comply with the principles of the EPBC Act Environmental Offsets Policy or an equivalent Queensland Government offsets policy that ensures the maintenance and protection of listed threatened species and communities.</p>		
<b>Chemical Risk Assessment</b>			
17.	<p>Prior to the use of any new drilling fluid compound/s, the approval holder must undertake a chemical risk assessment. The chemical risk assessment must be undertaken in accordance with best practice risk assessment methodology.</p>	<p>Chemicals are screened initially against internal Shell HSSE Framework processes for Product Stewardship. Health, Safety and or Environmental support may be requested on the basis of this screening. If the chemical is used in downhole activities (drilling, well remediation or trials), further qualitative assessment of the relative human health and environmental hazards are assessed, with particular focus on environmental risks through Persistence, Bioaccumulation and Toxicity analysis, and understanding of potential on-site and offsite receptors and pathways of exposure through a conceptual site model. These processes and criteria have been adopted from the <a href="#">Risk Assessment Guidance Manual: For chemicals associated with coal seam gas extraction Australian Government, (DEE), 2017.</a></p>	Compliant



Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non-Compliant/ Not applicable
18.	The approval holder must not use any new drilling fluid compound/s determined by the best practice risk assessment methodology to be high risk until the chemical risk assessment for that new drilling fluid compound has been approved in writing by the Minister. For any new drilling fluid compound identified as medium or high hazard, the chemical risk assessment must be provided to the Minister prior to the use of the new drilling fluid compound.	No new drilling fluids determined to be high or medium risk by the risk assessment methodology as per Condition 17 were used during <b>the Reporting Period.</b>	Not applicable
19.	The approval holder must implement the approved chemical risk assessment.	No new drilling fluids determined to be high or medium risk by the risk assessment methodology as per Condition 17 were used during <b>the Reporting Period.</b>	Not applicable
<b>Groundwater Dependent Ecosystem Monitoring and Management</b>			
20.	The approval holder must ensure that there is no adverse effect on the function of groundwater dependent ecosystems (GDEs) in, or within 30 km of, the project area as a result of groundwater extraction. The approval holder must minimise the surface disturbance of GDEs and ensure that there is no adverse effect on the viability of any patch of a GDE.	No adverse impact – as described in Annual Outcomes report & confirmed by Independent Expert review.	Compliant
21.	To ensure there is no adverse effect on the function of GDEs or viability of patches of GDEs, the approval holder must provide for the approval of the Minister: a) description and location of all patches of GDEs; b) performance criteria; c) trigger values; and d) limits.	Not due until December 2021.	Not applicable
22.	The description and location of all patches of GDEs, performance criteria, trigger values and limits must be submitted to the Minister	The Shell QGC Northern Development Area Groundwater Dependent Ecosystems Management	Compliant



Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non-Compliant/ Not applicable
	<p>with an accompanying GDE Program prepared by a suitably qualified water resources expert and accompanied by a GOE Program peer review undertaken by an independent suitably qualified water resources expert, which explains the scientific basis on which the description and location of all patches of GDEs, performance criteria, trigger values and limits have been derived to ensure that Condition 20 will be met. The GDE Program must include, and provide justification of:</p> <ul style="list-style-type: none"> <li>a) hydrogeological conceptual modelling, including an ecohydrological model incorporating the stressor-response relationships for all GDEs, local scale numerical modelling and consideration of cumulative impacts;</li> <li>b) a site-specific risk assessment;</li> <li>c) past and proposed ongoing monitoring;</li> <li>d) the procedure/methodology used to detect whether a trigger value and/or limit has been reached or exceeded and to identify the area contributing to the exceedance;</li> <li>e) proposed mitigation strategy, including corrective action(s) if trigger values and/or limits are reached or exceeded and consideration of cumulative impacts;</li> <li>f) evidence to confirm adverse effects on the function of GDEs or the viability of patches of GDEs have not occurred or are not occurring as a result of Stage 1 and to demonstrate that the proposed trigger values and limits have not been influenced by the commencement of Stage 1; and</li> <li>g) proposed reporting.</li> </ul>	<p>Plan was delivered to <b>the Department</b> in February 2021.</p>	



Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non-Compliant/ Not applicable
23.	The approval holder must not commence groundwater extraction associated with Stage 2 unless the description and location of all patches of GDEs, performance criteria, trigger values and limits have been approved by the Minister in writing.	The Shell QGC Northern Development Area Groundwater Dependent Ecosystems Management Plan was delivered to <b>the Department</b> in February 2021.	Compliant
24.	The description and location of all patches of GDEs, performance criteria, trigger values and limits must be provided to the Minister for written approval within 6 months of the commencement of groundwater extraction associated with Stage 1. The approval holder must not commence groundwater extraction associated with Stage 2 until the description and location of all patches of GDEs, performance criteria, trigger values and limits are approved by the Minister in writing.	The Shell QGC Northern Development Area Groundwater Dependent Ecosystems Management Plan was delivered to <b>the Department</b> in February 2021.	Compliant
25.	The approval holder must undertake the action in accordance with the approved performance criteria, trigger values and limits.	The approved performance criteria, trigger values and limits are in place for all relevant approvals within the Groundwater Dependent Ecosystems Management Plan.	Compliant
26.	For each 12 month period following the date of <b>commencement of groundwater extraction</b> , or in accordance with a date otherwise agreed in writing by the <b>Minister</b> , the approval holder must submit an outcomes report prepared by a <b>suitably qualified water resources expert</b> and accompanied by an <b>outcomes report peer review</b> undertaken by an <b>independent suitably qualified water resources expert</b> , for the written acceptance of the <b>Minister</b> . Each outcomes report, accompanied by the <b>peer review</b> , must be submitted to the <b>Minister</b> within 6 months of the end of the 12 month period that is the subject of the outcomes report.	Not due until July 2022.	Not applicable
27.	The outcomes report submitted under Condition 26 must include, but	Not due until July 2022.	Not applicable



Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non-Compliant/ Not applicable
	<p>not be limited to:</p> <p>a) Performance against the approved <b>trigger values and limits</b>, including analysis of trends that indicate that reaching or exceeding an approved <b>trigger value or limit</b> is likely during or before the next reporting period and demonstration of how <b>adverse effects</b> on the <b>viability of patches of GDEs</b> has been minimised.</p> <p>b) Any changes to the existing regulatory arrangements in place to avoid <b>adverse effects</b> to the <b>function of GDEs or viability of patches of GDEs</b>, not limited to legislation, standards or codes or practice, governance arrangements and existing controls.</p>		
28.	<p>The <b>Minister</b> may request the provision of additional information, and specify a deadline by which the approval holder must provide this information, to substantiate an outcomes report and/or to verify the risk to the <b>function of GDEs or viability of patches of GDEs</b>.</p>	Not due until July 2022.	Not applicable
29.	<p>If, on the basis of the information provided (or that has not been provided) under Condition 26 and/or Condition 28, and/or other information available to the <b>Minister</b>, the <b>Minister</b> determines that the action has had, or is likely to have, an <b>adverse effect</b> on the <b>function of GDEs or viability of patches of GDEs</b>, the <b>Minister</b> may notify the approval holder in writing in accordance with the provisions of Condition 31.</p> <p>Note 3: The Minister may throughout the life of the approval seek advice from experts, or an expert panel. As a consequence, specific matters identified through such advice may need to be addressed in the GDE Program or any outcomes report. Where such advice is sought, the approval holder will be provided with opportunity to submit information and respond to the specific matters identified, in order to ensure reports are based on the best available information. Review requirements will</p>	Not due until July 2022.	Not applicable



Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non-Compliant/ Not applicable
	facilitate adaptive management, align with Queensland Government approval requirements, and account for potential cumulative impacts as new scientific information becomes available over the life of the <b>Approval</b> .		
30.	If the approval holder detects that a <b>trigger value</b> has been reached or exceeded, the approval holder must report this to the <b>Minister</b> within five <b>business days</b> of the detection. If a <b>trigger value</b> is reached or exceeded, the approval holder must submit within 3 months of the detection, any proposed corrective action(s) to the <b>Minister</b> in writing and demonstrate that the proposed corrective action(s) will not result in <b>impacts</b> beyond the scope of the action. Proposed corrective action(s) must not be implemented unless the <b>Minister</b> agrees, in writing, that it will not result in <b>impacts</b> beyond the scope of the action.	QGC has not triggered these requirements.	Not applicable
31.	If the approval holder detects that a <b>limit</b> has been reached or exceeded, the approval holder must report this to the <b>Minister</b> within one <b>business day</b> of the detection. The approval holder must also cease groundwater extraction associated with the action and with the EPBC 2013/7047 approved action in the area identified as contributing to the exceedance of the limit as determined using the procedure/methodology required under Condition 22(d) within 48 hours of detecting that a <b>limit</b> has been reached or exceeded, or of receiving notification that the <b>Minister</b> has determined that an <b>adverse effect</b> on the <b>function of GDEs or viability of patches of GDEs</b> has occurred.	QGC has not triggered these requirements.	Not applicable
32.	If the approval holder has been required to cease groundwater extraction pursuant to Condition 31, the approval holder must not recommence groundwater extraction until the <b>impact</b> has been	QGC has not triggered these requirements.	Not applicable





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	<p>reversed, or the <b>Minister</b> has agreed, in writing, that no <b>adverse effect</b> on the <b>function of GDEs or viability of patches of GDEs</b> has occurred, is occurring or likely to occur, and approval to recommence groundwater extraction has been given by the <b>Minister</b> in writing. Approval to recommence groundwater extraction may be subject to conditions that the <b>Minister</b> considers reasonable. The Minister may direct the approval holder to implement corrective action(s) at the approval holder's expense.</p>		
33.	<p>Within two years of the date of this approval, the approval holder must submit revised descriptions and locations of all patches of GDEs, performance criteria, trigger values and limits for the written approval of the Minister. The revised performance criteria, trigger values and limits must be in accordance with coal seam gas water management guidelines.</p>	Not due until December 2021.	Not applicable
<b>Notification of date of commencement of Stage 1</b>			
34.	<p>The Approval holder must notify the <b>Department</b> in writing of the date of <b>commencement of stage 1</b> within 10 <b>Business days</b> after the date of <b>commencement of stage 1</b></p>	<p><b>The Department</b> was notified on the 6 March 2020 that commencement of Stage 1 occurred on the 05 March 2020.</p>	Compliant
35.	<p>If the commencement of Stage 1 does not occur within 5 years from the date of this approval, then the approval holder must not commence Stage 1 without the prior written agreement of the Minister.</p>	Stage 1 commenced on 05 March 2020.	Not applicable
<b>Compliance records</b>			
36.	<p>The approval holder must maintain accurate and complete compliance records.</p>	<p>All accurate and complete compliance records are kept at QGC's head office.</p>	Compliant



Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non-Compliant/ Not applicable
37.	<p>If <b>the Department</b> makes a request in writing, the approval holder must provide electronic copies of compliance records to <b>the Department</b> within the timeframe specified in the request.</p> <p>Note 4: Compliance records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the Department's website or through the general media.</p>	No request has been made by <b>the Department</b> within <b>the Reporting Period</b> .	Not Applicable
<b>Preparation and Publication of Plans</b>			
38.	<p>The approval holder must:</p> <ol style="list-style-type: none"> <li>a. submit plans electronically to <b>the Department</b>;</li> <li>b. publish each plan on the website within 20 business days of the date the plan is approved by the Minister or of the date a revised action management plan is submitted to the Minister or <b>the Department</b>, unless otherwise agreed to in writing by the Minister;</li> <li>c. exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public; and</li> <li>d. keep plans published on the website until the end date of this approval.</li> </ol>	<p>Management Plans have been submitted and published on <a href="#">Shell QGC external website - Management Plans</a> (refer to Appendix B).</p> <ul style="list-style-type: none"> <li>• SSMP – Approved on 09 February 2021.</li> <li>• Surat basin acreage Constraints Planning and Field Development Protocol – Approved on 4 January 2018.</li> <li>• Biosecurity Manual – Approved 2 October 2020.</li> <li>• Surat basin Acreage Development Offset Strategy and Management Plan (OMP) – Approved on 30 November 2020.</li> </ul> <p>The Offset Management Plan (OMP) was not published within the timeframe as per Condition 38 b. (i.e., within 20 business from the plan being approved by the Minister). The Plan was approved on the 30 November 2020 and published on the 02 June 2021. DAWE provided response on the 02 June 2021 on the decision to take no further compliance action regarding this matter.</p>	Non-Compliant



Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non-Compliant/ Not applicable
39.	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under a plan or conditions of this approval, is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to <b>the Department</b> in accordance with the requirements of the plan or conditions of approval.	Spatial metadata has been prepared in accordance with DAWE Guidelines and submitted to <b>the Department</b> electronically in conjunction with this report.	Compliant
<b>Annual compliance reporting</b>			
40.	<p>The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:</p> <ol style="list-style-type: none"> <li>a. publish each compliance report on the website within 60 business days following the relevant 12 month period;</li> <li>b. notify <b>the Department</b> by email that a compliance report has been published on the website and provide the weblink for the compliance report within five business days of the date of publication;</li> <li>c. keep all <b>compliance reports</b> publicly available on the <b>website</b> until this approval expires;</li> <li>d. exclude or redact <b>sensitive ecological data</b> from <b>compliance reports</b> published on the <b>website</b>; and</li> <li>e. where any <b>sensitive ecological data</b> has been excluded from the version published, submit the full <b>compliance report</b> to <b>the Department</b> within five <b>business days</b> of publication.</li> </ol> <p>Note 5: Compliance reports may be published on the Department's website.</p>	<p>This Annual Compliance Report satisfies this condition.</p> <p>Link to website: <a href="#">Shell QGC's external website - Environmental Management Reports</a></p>	Compliant



Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non-Compliant/ Not applicable
<b>Reporting non-compliance</b>			
41.	<p>The approval holder must notify <b>the Department</b> in writing of any: <b>incident</b>; non-compliance with the conditions; or non-compliance with the commitments made in <b>plans</b>. The notification must be given as soon as practicable, and no later than two <b>business days</b> after becoming aware of the <b>incident</b> or non-compliance. The notification must specify:</p> <ul style="list-style-type: none"> <li>a. any condition which is or may be in breach;</li> <li>b. a short description of the <b>incident</b> and/or non-compliance; and</li> <li>c. the location (including co-ordinates), date, and time of the <b>incident</b> and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.</li> </ul>	<p>Notifications of non-compliances with <b>the approval</b> outlined in this report have been provided to <b>the Department</b>.</p> <p>QGC did not notify the Department within the required two business days of becoming aware of the failure to publish the Offset management plan on QGC's website.</p>	Non-Compliant
42.	<p>The approval holder must provide to <b>the Department</b> the details of any <b>incident</b> or non-compliance with the conditions or commitments made in <b>plans</b> as soon as practicable and no later than <b>10 business days</b> after becoming aware of the <b>incident</b> or non-compliance, specifying:</p> <ul style="list-style-type: none"> <li>a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;</li> <li>b. the potential impacts of the <b>incident</b> or non-compliance; and</li> <li>c. the method and timing of any remedial action that will be undertaken by the approval holder.</li> </ul>	<p>No incidents or non-compliances with the conditions or commitments made in plans occurred during reporting period.</p>	Compliant
<b>Independent Audit</b>			
43.	<p>The approval holder must ensure that <b>independent audits</b> of compliance with the conditions are conducted as requested in writing by the <b>Minister</b>.</p>	<p>No such requests have been made by the Minister during <b>the Reporting Period</b>.</p>	Not Applicable



Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non- Compliant/ Not applicable
44.	For each <b>independent audit</b> , the approval holder must: <ul style="list-style-type: none"> <li>a. provide the name and qualifications of the independent auditor and the draft audit criteria to <b>the Department</b>;</li> <li>b. only commence the <b>independent audit</b> once the audit criteria have been approved in writing by <b>the Department</b>; and</li> <li>c. submit an audit report to <b>the Department</b> within the timeframe specified in the approved audit criteria.</li> </ul>	No such requests have been made by the minister during <b>the Reporting Period</b> (refer to Condition 43).	Not Applicable
45.	The approval holder must publish the audit report on the <b>website</b> within 10 <b>business days</b> of receiving <b>the Department's</b> approval of the audit report and keep the audit report published on the <b>website</b> until the end date of this approval.	Refer to conditions 43 and 44.	Not Applicable
<b>Revision of action management plans</b>			
46.	The approval holder may, at any time, apply to the <b>Minister</b> for a variation to an action management plan approved by the <b>Minister</b> under condition 6, 7, 8, 9, 10, 11 or 14, or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the <b>EPBC Act</b> . If the <b>Minister</b> approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.	The SSMP has been revised twice. The first revision (approved 23 January 2020) - because QGC found Greater Glider in the SBAD 1 Scope. The second amendment was to merge all gasfield SSMPs into a single document (approved 09 February 2021).	Compliant
47.	The approval holder may choose to revise an action management plan approved by the Minister under condition 6, 7, 8, 9 or 10 or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the RAMP would not be likely to have a new or increased impact.	The plan has not been amended without seeking and receiving formal approval.	Not applicable



Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non-Compliant/ Not applicable
48.	<p>If the approval holder makes the choice under condition 47 to revise an action management plan without submitting it for approval, the approval holder must:</p> <ul style="list-style-type: none"> <li>a. notify <b>the Department</b> in writing that the approved action management plan has been revised and provide <b>the Department</b> with:               <ul style="list-style-type: none"> <li>i. an electronic copy of the RAMP;</li> <li>ii. an electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP;</li> <li>iii. an explanation of the differences between the approved action management plan and the RAMP;</li> <li>iv. the reasons the approval holder considers that taking the action in accordance with the RAMP would not be likely to have a new or increased impact; and</li> <li>v. written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with <b>the Department</b>.</li> </ul> </li> <li>b. subject to condition 47, implement the RAMP from the RAMP implementation date.</li> </ul>	<p>No RAMP was submitted within <b>the Reporting Period</b> without submitting it for approval by the minister.</p>	<p>Not Applicable</p>



Condition Number/ reference	Condition	Statement of Compliance Evidence/Comments	Status Compliant/Non-Compliant/ Not applicable
49.	The approval holder may revoke their choice to implement a RAMP under condition 47 at any time by giving written notice to <b>the Department</b> . If the approval holder revokes the choice under condition 47, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under condition 47.	No RAMP was revoked during <b>the Reporting Period</b> .	Not Applicable
50.	If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the RAMP would be likely to have a new or increased impact, then: <ul style="list-style-type: none"> <li>a. condition 47 does not apply, or ceases to apply, in relation to the RAMP; and</li> <li>b. the approval holder must implement the action management plan specified by the Minister in the notice.</li> </ul>	The minister has not given a notice to the approval holder that taking the action in accordance with the RAMP would be likely to have a new or increased impact.	Not Applicable
51.	At the time of giving the notice under condition 50 the Minister may also notify that for a specified period of time, condition 47 does not apply for one or more specified action management plans.  <small>Note 6: conditions 47, 48, 49 and 50 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised action management plan, at any time, to the Minister for approval.</small>	Condition was not triggered during <b>the Reporting Period</b> .	Not Applicable.
<b>Completion of the Action</b>			
52.	Within 30 days after the completion of the action, the approval holder must notify <b>the Department</b> in writing and provide completion data.	Acknowledged. <b>The Approval</b> still current and ongoing.	Not Applicable



## APPENDIX B – List of Environmental Management Plans<sup>1</sup>

Area	Document Title	Document #
Whole of Project	Reinstatement and Rehabilitation Manual	QCQGC-BX00-ENV-MAN-000005 Rev 03 – Jan 2020
	Biosecurity Manual (former Pest and Weed Management Plan)	QCQGC-BX00-ENV-MAN-000002 Rev 05 – Jun 2020
Surat Basin Acreage	QGC Significant Species Management Plan (SSMP)	QCLNG-BX00-ENV-PCE-350012 Rev 00 – Dec 2020
	Surat Basin Acreage Constraints Planning and Field Development Protocol	QCLNG-BX00-ENV-PLN-000023 Rev 02 – Nov 2017
	Surat Basin Acreage Development Offset Strategy and Management Plan (OMP)	QCQGC-BX00-ENV-PLN-000024 Rev 02 – Nov 2020

Refer to [QGC Environmental Management Plans | Shell Australia](#).

<sup>1</sup> Management Plans prepared or in existence in relation to the conditions of **the Approval** during the relevant 12 month period (i.e., **the Reporting Period**).