

# Compliance Report

## Carmichael Coal Mine and Rail Project

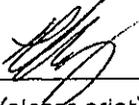
EPBC 2010/5736

13 October 2017 to 12 October 2018

1. **DECLARATION OF ACCURACY**

In making this declaration, I declare that to the best of my knowledge the information I have given on or attached to this compliance report is complete, current and correct. I understand that giving false or misleading information is a serious offence

Signed



Full name (please print)

HARVISH MANDI

Position (please print)

HEAD OF ENVIRONMENT & SUSTAINABILITY

Organisation (please print including ABN/ACN if applicable)

ADANI MINING PTY LTD

Date 11 / 01 / 2019

2. **DOCUMENT VERSION CONTROL**

Rev	Issue Date	Description of revisions	Signatures			
			Originator	Checked	Approved	Date
A	9/1/2019	Draft – Revision A Preparation of compliance report	V. Vong	N. Goodwin C. Morris M. McNamara H. Manzi	H. Manzi	9/1/2019
0	10/1/2019	Final For publication	V. Vong	H. Manzi	H. Manzi	10/1/2019

## CONTENTS

SECTION	PAGE
1. DECLARATION OF ACCURACY .....	2
2. DOCUMENT VERSION CONTROL.....	3
4. DESCRIPTION OF ACTIVITIES .....	5
5. COMPLIANCE TABLE.....	6
6. NEW ENVIRONMENTAL RISKS.....	25

#### 4. DESCRIPTION OF ACTIVITIES

EPBC number	2010/5736
Project name	Carmichael Coal Mine and Rail Infrastructure Project
Approval holder and ACN or ABN	Adani Mining Pty Ltd ACN 145 455 205
The approved action	To develop an open cut and underground coal mine, 189km rail link and associated infrastructure approximately 160km north west of Clermont in central Queensland [See EPBC Act referral 2010/5736 and approved variations dated 19 April 2012, 9 October 2012 and 24 July 2013].
Details of activities undertaken during report period	<p><u>Activities "commenced"</u></p> <ul style="list-style-type: none"> <li>• Early works activities undertaken specifically relating to the <u>rail component</u> of the approved action included the establishment of temporary fencing, clearing and grubbing, filling and excavation and surveys including environmental and cultural heritage</li> </ul> <p><u>Other activities undertaken but are not "commencement"</u></p> <ul style="list-style-type: none"> <li>• Exploratory activities undertaken for the <u>mine component</u> of the approved action included the installation of groundwater monitoring bores, exploratory drilling to investigate groundwater flow rates and the preparation of additional access tracks and pads. Surveys including environmental and cultural heritage were also undertaken. Exploratory activities do not meet the definition of mining operations and the works did not impact any Matters of National Environmental Significance. The Federal Department were notified of these works in November 2017.</li> </ul>
Location of the project	Approximately 160km north west of Clermont, central Queensland
Person accepting responsibility for the report	Hamish Manzi – Head of Environment & Sustainability  Internal audit completed by Vanessa Vong – Manager, Environment
Dates for the reporting period of the report	13 October 2017 to 12 October 2018
Date of preparation of the report	This compliance report prepared in January 2019

## 5. COMPLIANCE TABLE

An internal audit was completed in October 2018 and the compliance table below presents the audit findings. The criteria used in the internal audit are below. The criteria has been sourced as per the New South Wales Government Independent Audit Guideline:

- **Compliant:** Where the auditor has collected sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit.
- **Non-compliant:** Where the auditor has collected sufficient verifiable evidence to demonstrate that the intent of one or more specific elements of the regulatory approval have not been complied with within the scope of the audit.
- **Not verified:** Where the auditor has not been able to collect sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. In the absence of sufficient verification the auditor may in some instances be able to verify by other means (visual inspection, personal communication etc) that a requirement has been met. In such a situation, the requirement should still be assessed as not verified. However the auditor could note in the report that they have no reasons to believe that the operation is non-compliant with that requirement.
- **Not triggered:** A regulatory approval requirement has an activation or timing trigger that has not been met at the time of the audit, therefore a determination of compliance could not be made
- **Note:** A statement or fact, where no assessment of compliance is required.

Condition no.	Condition	Is the project compliant?	Evidence/Comments
1	<i>Conditions attached to the approval</i> The Minister may determine that a plan, strategy or program approved by the Queensland Government satisfies a plan, strategy or program required under these conditions.	Note	This condition is a statement where no assessment of compliance is required.
2	<i>Project area</i> For the purpose of the action, the approval holder must not clear vegetation outside the Project Area shown at Appendix A unless targeted surveys have demonstrated that Matters of National Environmental Significance are unlikely to be impacted.	Compliant	Exploratory activities undertaken for the mine component of the approved action occurred within the Project Area and no Matters of National Environmental Significance (MNES) were observed through the completion of pre-clearance ecological surveys. The Federal Department was notified on 17 November 2017. The activities undertaken as part of the mine component is not commencement.

Condition no.	Condition	Is the project compliant?	Evidence/Comments
			Verification during the internal audit of the clearing footprints overlayed on geographical information systems confirms that all clearing was undertaken within the approved Project Area.
3	<p><i>Groundwater management and monitoring plan (GMMP)</i></p> <p>At least three months prior to commencing excavation of the first box cut, the approval holder must submit to the Minister for approval a Groundwater Management and Monitoring Plan (GMMP). The GMMP must be informed by the results of the groundwater flow model re-run (condition 23) and contain the following:</p> <ul style="list-style-type: none"> <li>a) details of a groundwater monitoring network that includes: <ul style="list-style-type: none"> <li>i. control monitoring sites</li> <li>ii. sufficient bores to monitor potential impacts on the Great Artesian Basin (GAB) aquifers (whether inside or outside the Project Area)</li> <li>iii. a rationale for the design of the monitoring network with respect to the nature of potential impacts and the location and occurrence of matters of national environmental significance (whether inside or outside the Project Area)</li> </ul> </li> <li>b) baseline monitoring data</li> <li>c) details of proposed trigger values for detecting impacts on groundwater levels and a description of how and when they will be finalised and subsequently reviewed in accordance with state approvals</li> <li>d) details of groundwater level early warning triggers and impact thresholds for the Doongmabulla Springs Complex, informed by groundwater modelling and corrective actions and/or mitigation measures to be taken if the triggers are exceeded where caused by mining operations, to ensure that groundwater drawdown as a result of the project does not exceed an interim threshold of 0.2 metres at the Doongmabulla Springs Complex <ul style="list-style-type: none"> <li>i. the early warning triggers and impact thresholds must be informed by groundwater modelling in accordance with Conditions 3e)i, 22, 23 and 24 and the relevant requirements of the environmental authority held under the Environmental Protection Act 1994 (in particular requirements arising in response to the conditions at Appendix 1, Section 1, Schedule E of the Coordinator-General's Assessment Report)</li> <li>ii. the interim drawdown threshold required under condition 3d) may be replaced with a new drawdown threshold, if the approval</li> </ul> </li> </ul>	Compliant	<p>A GMMP was prepared to meet all requirements of this condition. Version 1 of the GMMP was submitted to Federal Department and the Queensland Government on 1 August 2017. Subsequent revisions have been submitted since with the latest version in August 2018.</p> <p>The scope of this compliance report does not include commencement of the first box cut.</p>

Condition no.	Condition	Is the project compliant?	Evidence/Comments
	<p>holder applies to the Minister for approval to change it, and submits further evidence supported by further groundwater modelling and other scientific investigations (such as those required in conditions 25 and 27), that a new drawdown threshold will ensure the protection and long-term viability of the Doongmabulla Springs Complex.</p> <p>e) details of the timeframe for a regular review of the GMMP in accordance with the requirements of the environmental authority issued under the Environmental Protection Act 1994, and subsequent updates of the GMMP, including how each of the outcomes of the following will be incorporated:</p> <ul style="list-style-type: none"> <li>i. independent review and update of the groundwater conceptual model, as well as the numerical groundwater model and water balance calculations as necessary, to incorporate monitoring data</li> <li>ii. future baseline research required by the Queensland Coordinator-General into the Mellaluka Springs Complex (Appendix 1, Section 3, Condition 1 of the Coordinator-General's Assessment Report)</li> <li>iii. the GAB Springs Research Plan (Conditions 25 and 26)</li> <li>iv. the Rewan Formation Connectivity Research Plan (Conditions 27 and 28)</li> </ul> <p>f) provisions to make monitoring data available to the Department and Queensland Government authorities (if requested) on a six monthly basis for inclusion in any cumulative impact assessment, regional water balance model, bioregional assessment or relevant research required by the Bioregional Assessment of the Galilee sub-region and the Lake Eyre Basin and any subsequent iterations.</p> <p>g) provisions to make monitoring results publicly available on the approval holder's website for the life of the project</p> <p>h) a peer review by a suitably qualified independent expert and a table of changes made in response to the peer review.</p>		
4	<p><i>Groundwater management and monitoring plan (GMMP)</i>                      The approval holder must not commence excavation of the first box cut until the GMMP has been approved by the Minister in writing. The approved GMMP must be implemented.</p>	Not triggered	<p>The scope of this compliance report does not include commencement of the first box cut.</p> <p>The GMMP has been submitted to the Federal Department and the Queensland Government. However, it has not yet been approved by the Minister in writing.</p>

Condition no.	Condition	Is the project compliant?	Evidence/Comments
	<p>Note: Many elements of the GMMP are also required under the state approval for the project. Where possible, a combined document should be prepared that addresses both state government and EPBC Act approval conditions.</p>		
5	<p><i>Matters of National Environmental Significance Management Plan/s (MNESMP)</i></p> <p>At least three months prior to commencement of mining operations, the approval holder must submit to the Minister for approvals Matters of National Environmental Significance plan/s for the management of direct and indirect impacts of mining operations on MNES</p> <p>Note: If the MNESMP does not address specific future activities (e.g. possible additional seismic surveys or specific mining stages) it should be updated in accordance with Condition 33.</p>	Compliant	<p>The scope of this compliance report does not include commencement of mining operations.</p> <p>The MNESMPs applicable to this condition include:</p> <ul style="list-style-type: none"> <li>• Species management plan for SP1 (rail)</li> <li>• Species management plan for Carmichael Mine and Offsite Infrastructure</li> <li>• Groundwater dependent ecosystem management plan (GDEMP)</li> <li>• Black-throated finch management plan (BTFMP)</li> </ul> <p>The Species Management Plans (SMP) for both SP1 and Carmichael Mine and Offsite Infrastructure, both dated in May 2016 were approved on 20 July 2016. These plans are both published and available on the <a href="http://www.adaniaustralia.com.au">www.adaniaustralia.com.au</a> website.</p> <p>The BTFMP (version 6) was lodged in June 2018. The GDEMP (version 9) was lodged in July 2018.</p> <p>The GDEMP and the BTFMP being assessed by the Federal Department and the Queensland Government and have not yet been approved. All these plans have been submitted at least three months prior to commencement of mining operations.</p>
6	<p><i>Matters of National Environmental Significance Management Plan/s (MNESMP)</i></p> <p>The MNESMP must incorporate the results of the groundwater flow model re-run (condition 23) where relevant, and be consistent with relevant recovery plans, threat abatement plans and approved conservation advices and must include:</p> <ol style="list-style-type: none"> <li>a) a description of environmental values for each of the matters of National Environmental Significance addressed in the plan</li> <li>b) details of baseline and impact monitoring measures to be implemented for each of the Matters of National Environmental Significance including</li> </ol>	Compliant	<p>The MNESMPs applicable to this condition include:</p> <ul style="list-style-type: none"> <li>• SMP for SP1 (rail)</li> <li>• SMP for Carmichael Mine and Offsite Infrastructure</li> <li>• GDEMP</li> <li>• BTFMP</li> </ul> <p>During the internal audit it was confirmed that the requirements of condition 6 and part a) to l) have been included in each of the relevant management plan</p>

Condition no.	Condition	Is the project compliant?	Evidence/Comments
	<p>control and impact sites to be monitored throughout the life of the project. The monitoring must provide sufficient data to quantify likely impacts resulting from mining operations, including subsidence and changes in groundwater levels, to set habitat management goals (Conditions 6e) and 6f))</p> <p>c) details of potential impacts, including area of impact, on each of the Matters of National Environmental Significance from mining operations, including impacts from:</p> <ul style="list-style-type: none"> <li>i. vegetation clearing</li> <li>ii. subsidence from underground mining, including subsidence induced fracturing and any changes to groundwater or surface water flow</li> <li>iii. mine dewatering</li> <li>iv. earthworks</li> <li>v. noise and vibration</li> <li>vi. emissions (including dust)</li> <li>vii. light spill and other visual impacts</li> <li>viii. stream diversion and flood levees</li> <li>ix. weeds and pests</li> </ul> <p>d) measures that will be undertaken to mitigate and manage impacts on Matters of National Environmental Significance resulting from mining operations. These measures include but not be limited to:</p> <ul style="list-style-type: none"> <li>i. the use of fauna spotters prior to and during all vegetation clearing activities to ensure impacts on Matters of National Environmental Significance are minimised</li> <li>ii. measures to avoid impacts on Matters of National Environmental Significance and their habitat located in the Project Area, but outside areas to be cleared, constructed upon and/or undermined, including adjacent to cleared areas</li> <li>iii. measures to rehabilitate all areas of Matters of National Environmental Significance habitat</li> <li>iv. habitat management measures including but not limited to management of subsidence and groundwater impacts of the project.</li> </ul> <p>e) goals for habitat management for each relevant Matter of National Environmental Significance</p> <p>f) a table of specific criteria for assessing the success of management measures against goals, and triggers for implementing corrective measures if criteria are not met within specified timeframes. This table</p>		<p>deliverable scopes of works. These requirements have been addressed prior to submitting the plans to the Federal Department for assessment and approval.</p> <p>Of the plans above, only the SMPs for both SP1 and Carmichael Mine and Offsite Infrastructure, both dated in May 2016 were approved on 20 July 2016. These plans are both published and available on the <a href="http://www.adaniaustralia.com.au">www.adaniaustralia.com.au</a> website. With regards to condition 6i), it was verified that the approved SMPs for both SP1 and Carmichael Coal Mine and Offsite Infrastructure, presented content consistent to achieve compliance with the requirements of the condition.</p> <p>The BTFMP (version 6) was lodged in June 2018. The GDEMP (version 9) was lodged in July 2018.</p> <p>The GDEMP and the BTFMP are being assessed by the Federal Department and the Queensland Government and have not yet been approved.</p> <p>During the internal audit, it was advised that the groundwater flow model re-run was incorporated into the updated GDEMP (version 9) that was submitted to the Federal Department for assessment and approval in July 2018.</p> <p>With regards to condition 6k), the Office of the Coordinator-General confirmed in correspondence dated 22 July 2016 that Appendix 1, Section 3, Condition 1 d)i) relating to the Mellaluka Springs Complex and the black-throated finch had been met.</p>

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	<p>must include but not be limited to measures relating to subsidence and groundwater impacts, including early warning triggers for impacts on groundwater at the Doongmabulla Springs Complex and the Carmichael River. Goals and triggers must be based on the baseline condition of the relevant Matters of National Environmental Significance as determined through baseline monitoring (see Conditions 3b and 6b). Corrective measures must include provision of offsets where it is determined that corrective management measures have not achieved goals within specified timeframes (see Conditions 11m) and 11o))</p> <p>g) an ongoing monitoring program to determine the success of mitigation and management measures against the stated criteria in Condition 6f), including monitoring locations, parameters and timing. Monitoring for water resource Matters of National Environmental Significance must include hydrogeological, hydrological and ecological parameters</p> <p>h) details of how compliance will be reported</p> <p>i) details of how the MNESMP will be updated to incorporate and address outcomes from research undertaken for Matters of National Environmental Significance under this and any state approvals, including updating of goals, criteria and triggers (as required under Conditions 3c), 3d), 6e) and 6f))</p> <p>j) provisions to ensure that suitably qualified and experienced persons are responsible for undertaking monitoring, review and implementation of the MNESMP</p> <p>k) in the event that future baseline research required by the Queensland Coordinator-General (Appendix 1, Section 3, Condition 1 of the Coordinator-General's Assessment Report) identifies that the Mellaluka Springs Complex provides high value habitat for the black throated finch, the approval holder must include management measures to address impacts resulting from drawdown at the Mellaluka Springs Complex in the MNESMP</p> <p>l) details of how, where habitat for an EPBC Act listed threatened species or community not previously identified and reported to the Department is found in the Project area, the approval holder will notify the Department in writing within five business days of finding this habitat, and within 20 business days of finding this habitat will outline in writing how the conditions of this approval will still be met (refer Condition 11h))</p>		
7	<i>Matters of National Environmental Significance Management Plan/s (MNESMP)</i>	Compliant	The GDEMP and the BTFMP are being assessed by the Federal Department and the Queensland Government

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	<p>Mining operations must not commence until the required MNESMP have been approved by the Minister in writing. The approved plan/s must be implemented.</p> <p>Note: Management plans (such as the Black Throated Finch Management Plan and the Groundwater Dependent Ecosystems Management Plan) may also be required under state approvals. Whenever possible a combined document should be prepared to address both state government and EPBC Act approval conditions.</p> <p>Note: Impacts of the action other than mining operations will be offset as required in accordance with Conditions 8 to 11, but will be otherwise managed in accordance with state approvals - this is of particular relevance when impacts may occur prior to approval of the MNESMP.</p>		<p>and have not yet been approved. Mining operations have not commenced.</p> <p>The SMP for SP1 dated May 2016 was approved on 20 July 2016. It was verified that the approved SMP for SP1 was being implemented.</p>																																																	
8	<p><i>Offset requirements</i></p> <p>The approval holder must legally secure the minimum offset areas detailed in Table 1 within two years of commencement of the specified component of the action.</p> <p><b>Table 1. Minimum offset areas required for impacts on EPBC Act listed threatened species and communities and initial contribution to offsets for subsidence impacts from underground mining</b></p> <table border="1" data-bbox="353 847 1037 1342"> <thead> <tr> <th>Environmental value</th> <th>Offset for mining operations north of Carmichael River (hectares)</th> <th>Offset for mining operations south of Carmichael River (hectares)</th> <th>Initial offset for underground mining component (hectares)</th> <th>Offset for off-lease infrastructure (hectares)</th> <th>Offset for rail east component (hectares)</th> <th>Offset for rail west component (hectares)</th> </tr> </thead> <tbody> <tr> <td>Black throated finch (southern)</td> <td>18 204.06</td> <td>10 739.39</td> <td>2,000.00</td> <td>7.62</td> <td>2.44</td> <td>46.48</td> </tr> <tr> <td>Brigalow ecological community</td> <td>15.12</td> <td>721.11</td> <td></td> <td>0.00</td> <td>6.26</td> <td>72.50</td> </tr> <tr> <td>Ornamental snake</td> <td>96.39</td> <td>38.61</td> <td></td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Squatter pigeon (southern)</td> <td>1598.00</td> <td>902.00</td> <td></td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Waxy cabbage palm</td> <td>90.00</td> <td>0.00</td> <td></td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Yakka skink</td> <td>3770.48</td> <td>1815.42</td> <td></td> <td>1.87</td> <td>0.60</td> <td>11.63</td> </tr> </tbody> </table> <p><i>Note: Offsets for different species may overlap where they share the same habitat requirements.</i></p>	Environmental value	Offset for mining operations north of Carmichael River (hectares)	Offset for mining operations south of Carmichael River (hectares)	Initial offset for underground mining component (hectares)	Offset for off-lease infrastructure (hectares)	Offset for rail east component (hectares)	Offset for rail west component (hectares)	Black throated finch (southern)	18 204.06	10 739.39	2,000.00	7.62	2.44	46.48	Brigalow ecological community	15.12	721.11		0.00	6.26	72.50	Ornamental snake	96.39	38.61		0.00	0.00	0.00	Squatter pigeon (southern)	1598.00	902.00		0.00	0.00	0.00	Waxy cabbage palm	90.00	0.00		0.00	0.00	0.00	Yakka skink	3770.48	1815.42		1.87	0.60	11.63	Not triggered	<p>The Biodiversity Offset Strategy (BOS) was approved by Federal Department on 7 October 2016. Of the specified components of the approved action in Table 1, only the "rail west" component has officially commenced on 13 October 2017). Two years from the date of commencement is by 13 October 2019.</p>
Environmental value	Offset for mining operations north of Carmichael River (hectares)	Offset for mining operations south of Carmichael River (hectares)	Initial offset for underground mining component (hectares)	Offset for off-lease infrastructure (hectares)	Offset for rail east component (hectares)	Offset for rail west component (hectares)																																														
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9	<p><i>Biodiversity offset strategy and biodiversity funding</i> To compensate for authorised unavoidable impacts on Matters of National Environmental Significance, the approval holder must submit a Biodiversity Offset Strategy (BOS) and a GAB Offset Strategy to the Minister for approval at least three months prior to commencement of mining operations.</p>	Compliant	<p>The BOS and the GAB Offset Strategy were approved on 7 October 2016 and 18 August 2016 respectively.</p> <p>The scope of this compliance report does not include commencement of mining operations.</p>
10	<p><i>Biodiversity offset strategy and biodiversity funding</i> Offsets for authorised unavoidable impacts (defined in Table 1), and water resource impacts must be managed in accordance with the BOS and the GAB Offset Strategy.</p>	Not triggered	<p>The BOS and the GAB Offset Strategy were approved on 7 October 2016 and 18 August 2016 respectively.</p> <p>The scope of this compliance report does not include commencement of mining operations.</p>
11	<p><i>Biodiversity offset strategy and biodiversity funding</i> The BOS must be consistent with the Galilee Basin Strategic Offset Strategy, relevant recovery plans, threat abatement plans, conservation advices and MNESMP (see Condition 6), including the Black Throated Finch Management Plan (Appendix 1, Section 1, Schedule I, Condition I6 of the Coordinator-General's Assessment Report). The BOS must include the following (except for the matters at 11k) and 11f), which apply to the Great Artesian Basin (GAB) Offset Strategy):</p> <ul style="list-style-type: none"> <li>a) location of species and communities habitat offset areas including maps in electronic Geographic Information System (GIS) format</li> <li>b) details of how offset sites have been or will be legally secured within required timelines to ensure their long-term protection</li> <li>c) a monitoring program for the offset site/s suitable to measure the success of management measures against stated performance criteria including monitoring locations, parameters and timing</li> <li>d) a description of the potential risks to the successful implementation of the BOS, and details of contingency measures that will be implemented to mitigate these risks</li> <li>e) details of how the BOS will be updated to incorporate outcomes from research undertaken for Matters of National Environmental Significance under this and any state approvals, including updating of goals, criteria and triggers (as outlined at Conditions 3 c), 3d), 6e) and 6f)). This must include outcomes of baseline research required by the Queensland Coordinator-General to identify whether the Mellaluka Springs Complex provides high value habitat for the black throated finch (Appendix 1, Section 3, Condition 1 of the Coordinator-General's Assessment Report)</li> <li>f) an outline of how compliance will be reported</li> </ul>	Compliant	<p>The BOS was submitted on 24 August 2016 and subsequently approved by the Federal Department on 7 October 2016.</p> <p>With regards to condition 11j), the Office of the Coordinator-General confirmed in correspondence dated 22 July 2016 that Appendix 1, Section 3, Condition 1 d)i) relating to the Mellaluka Springs Complex and the black-throated finch has been met.</p> <p>With regards to condition 11k) and l), the GAB Offset Strategy was submitted on 22 July 2016 and subsequently approved by the Federal Government on 18 August 2016.</p>

Condition no.	Condition	Is the project compliant?	Evidence/Comments
	<p>g) provisions to ensure that suitably qualified and experienced persons are responsible for undertaking monitoring, review, and implementation of the BOS</p> <p>h) detailed processes for any residual impacts on Matters of National Environmental Significance, (see Condition 6f)) to be offset in accordance with the EPBC Act Offsets Policy including a process for offset requirement to be developed in consultation with the Department and relevant Queensland Government agencies</p> <p>i) a detailed process for any significant residual impact on any EPBC listed threatened species or ecological community not identified in Table 1 to be offset in accordance with the EPBC Act Offsets Policy (refer Condition 6l))</p> <p>j) in the event that the future baseline research required by the Queensland Coordinator-General (Appendix 1, Section 3, Condition 1 of the Coordinator General’s Assessment Report) identifies that the Mellaluka Springs Complex provides high value habitat for the black throated finch, the approval holder must:</p> <ul style="list-style-type: none"> <li>i. revise black throated finch offset requirement in the BOS in accordance with the EPBC Act Offsets Policy and submit the revised BOS to the Minister for approval</li> <li>ii. management of any additional black throated finch offsets in accordance with Conditions 13 and 14 must commence prior to hydrological impacts on the Mellaluka Springs Complex, with sites being legally secured within two years of that time.</li> </ul> <p>k) implementation of an annual GAB offset measure, of returning at least 730 megalitres per annum to the GAB for a minimum five year period from commencement of excavation of the first box cut, to offset the predicted annual water take associated with the action. This offset measure to achieve a measurable outcome in accordance with one or more of the following principles:</p> <ul style="list-style-type: none"> <li>i. reduce current extraction rates from GAB to increase hydraulic pressure</li> <li>ii. increase pressure in the GAB</li> <li>iii. protect and rehabilitate the GAB springs</li> <li>iv. other measures consistent with government policies and strategies to protect and manage the GAB.</li> </ul> <p>l) the offset measure described in Condition 11k) is to be developed and delivered in consultation with the Queensland Government department administering the authorisation of the water take</p>		

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m)	<p>details of how staged subsidence, groundwater and water resource impacts in the Project Area will be addressed in the BOS, including:</p> <ul style="list-style-type: none"> <li>i. description and map of the proposed stages of underground mining. The approval holder must advise the Minister of any changes to these staging details. Underground mining Stage 1 must be consistent with the corresponding definition in these conditions</li> <li>ii. description of how actual subsidence, groundwater and water resource impacts for all completed stages (as defined through Condition 11m)(i)) will be assessed at each stage</li> <li>iii. description of the extent, magnitude and timing of actual subsidence impacts observed in completed stages (as defined through Condition 11m)(i)).</li> <li>iv. description of how actual subsidence and groundwater impacts from completed stages (as defined through Condition 11m)(i)) will be used to revise and updated predicted impact areas for future stages</li> <li>v. table of predicted impact areas for each EPBC Act listed threatened species and community in Table 1 within the underground mining area (consistent with Condition 6c)) that allows comparison of actual impact areas with initial impact area predictions and updated impact area predictions. If additional impacted areas are identified as a result of the predictions, additional offsets must be implemented in line with Condition 11h)</li> <li>vi. written commitments from the approval holder that the balance of offset requirement at each stage (as defined through Condition 11m)(i)) will be implemented prior to commencement of that stage.</li> </ul>		
n)	<p>rationale for the balance of offset required for underground mining impacts to be updated at each underground mining stage (as defined through Condition 11m)(i)) that includes detailed comparison of the ecological status of EPBC Act listed threatened species and communities within the subsidence impact area between baseline conditions and the end of the most recent underground mining stage</p>		
o)	<p>details of how groundwater and water resource impacts on the Matters of National Environmental Significance will be addressed in the BOS including identification of additional potential offsets (see Condition 6f)) for the Carmichael River and Doongmabulla Springs Complex, to be</p>		

Condition no.	Condition	Is the project compliant?	Evidence/Comments
	<p>developed in consultation with the Department and relevant Queensland Government agencies</p> <p>p) detail of how the BOS will be revised and provided to the Minister for approval prior to commencement of each underground mining stage (as defined through Condition 11m)(i)) including timeframes for revision that allow three months for review and approval of the plan</p>		
12	<p><i>Biodiversity offset strategy and biodiversity funding</i></p> <p>Mining operations must not commence until the BOS and the GAB Offset Strategy is approved by the Minister in writing. The approved BOS and the GAB Offset Strategy must be implemented.</p> <p>Note: A Biodiversity Offset Strategy is also required under the State Government approval for the project. A combined document should be prepared to address both State Government and EPBC Act approval conditions where possible.</p>	Compliant	<p>The scope of this compliance report does not include commencement of mining operations.</p> <p>The BOS and the GAB Offset Strategy were approved on 7 October 2016 and 18 August 2016 respectively.</p> <p>The Queensland Government approved the BOS on 25 October 2016.</p>
13	<p><i>Offset area management plans (OAMP)</i></p> <p><u>Note that this is a varied condition dated 5 January 2017</u></p> <p>Within four months of approval of the BOS, and thereafter within four months of the approval of the revised BOS in accordance with Conditions 6, 8, 11 or 20, the approval holder must submit to the Minister for approval a management plan for that offset area. Each offset area management plan must address the relevant requirements of the BOS, and contain:</p> <p>a) detailed baseline description of offset areas, including surveys undertaken, condition of existing Matters of National Environmental Significance and their habitats, relevant environmental values, area of primary habitat for each EPBC Act listed threatened species and community, connectivity with other habitat areas and biodiversity corridors</p> <p>b) management measures and offset plans for each offset area to improve the habitats of Matters of National Environmental Significance</p> <p>c) a table of specific goals and associated timeframes for habitat management measures for each offset area with criteria for assessing the success of habitat management measures and corrective measures to be implemented if criteria are not met</p>	Compliant	<p>The BOS was approved by the Federal Department on 7 October 2016 and the Queensland Government on 25 October 2016. Version 1 of the OAMP was submitted to Federal Department on 6 February 2017 and Version 2 submitted on 19 July 2018 for assessment and approval.</p>
14	<p><i>Offset area management plans (OAMP)</i></p> <p>Once approved, offset area management plans must be implemented.</p>	Not triggered	<p>The OAMPs are still being assessed for approval by the Federal Department.</p>
15	<p><i>Biodiversity funding</i></p>	Not verified	<p>The proposed funding arrangement was submitted to the Federal Department for assessment on 17 October</p>

Condition no.	Condition	Is the project compliant?	Evidence/Comments
	The approval holder must establish and/or contribute to a pool of funds established for the better protection and long term conservation of EPBC Act listed threatened species and communities listed in Table 1.		2017 and 22 January 2018. The Federal Department are progressing the assessment of the program and fund for approval.
16	<i>Biodiversity funding</i> The mechanism to establish and/or contribute to a pool of funds, including terms of reference to support a regional approach, funding mechanisms and an initial work plan, must be provided to the Minister for approval three months prior to commencement of mining operations. The mechanism may be in the form of a trust fund, or other mechanism/s as agreed by the Minister in writing.	Not verified	The proposed funding arrangement was submitted to the Federal Department for assessment on 17 October 2017 and 22 January 2018. The Federal Department are progressing the assessment of the program and fund for approval.  The scope of this compliance report does not include commencement of mining operations.
17	<i>Biodiversity funding</i> The approval holder must contribute \$100 000 (GST exclusive) per annum for 10 consecutive years to the pool of funds beginning from commencement of mining operations. The approval holder must provide notice of the establishment of and/or contribution to the pool of funds to the Department in writing prior to commencement of mining activities. Documentary evidence must be provided to the Department showing that the annual financial contributions to the pool of funds have been provided within 30 calendar days of each payment.	Not triggered	The scope of this compliance report does not include commencement of mining operations.  The proposed funding arrangement was submitted to the Federal Department for assessment on 17 October 2017 and 22 January 2018. The Federal Department are progressing the assessment of the program and fund for approval.
18	<i>Biodiversity funding</i> These funds must facilitate the development and implementation of research programs consistent with priorities to manage development impacts on EPBC Act listed threatened species and communities listed in Table 1 which are consistent with, and take into consideration, any relevant recovery plans, threat abatement plans and/or conservation advices. Research programs should identify measures to mitigate and manage the impacts on EPBC Act listed threatened species and communities listed in Table 1 and should address where relevant: a) methodologies for a baseline survey that will report on each species' life history, movement patterns, habitat requirements and population dynamics. Survey methodologies must be in accordance with the Department's survey guidelines or alternative best practice methodologies that are agreed to in writing by the Minister prior to commencement and endorsed by a suitably qualified independent expert. The baseline survey must begin with the first year of the date of this approval	Not verified	The proposed funding arrangement was developed to meet the requirements of this condition. It has been submitted to the Federal Department for assessment on 17 October 2017 and 22 January 2018. The Federal Department are progressing the assessment of the program and fund for approval.

Condition no.	Condition	Is the project compliant?	Evidence/Comments
	<ul style="list-style-type: none"> <li>b) an ongoing monitoring program (developed from the baseline monitoring) for each species, to continue for the duration of the project approval, with annual reporting to the Department</li> <li>c) commitments, including financial commitments and associated timeframes, that will be implemented by the approval holder to support the undertaking of research</li> <li>d) the time frames for undertaking each research component</li> <li>e) timing and methods of reporting research outcomes to the Minister, the scientific community and the public</li> <li>f) outcomes of consultation with the Department on how the proposed Research Programs align with other studies for EPBC Act listed threatened species and communities listed in Table 1</li> <li>g) identification of priority actions for funding must be decided in consultation with the Queensland Department of Environment and Heritage Protection and members of relevant Recovery Teams.</li> </ul>		
<b>19</b>	<p><i>Biodiversity funding</i></p> <p>A review of funding must be undertaken five years after the establishment of the pool of funds and/or the commencement of the action or as otherwise agreed by the Minister in writing. This review must take into account progress of the research programs and any subsequent on ground actions, as well as the involvement of other holders of approvals under the EPBC Act in funding and administrative arrangements. The review must be provided to the Department within six months after the five year period.</p>	Not triggered	The proposed funding arrangement was submitted to the Federal Department for assessment on 17 October 2017 and 22 January 2018. The Federal Department are progressing the assessment of the program and fund for approval.
<b>20</b>	<p><i>3D seismic survey management plan</i></p> <p>The approval holder must submit a 3D Seismic Survey Management Plan to the Minister for approval, allowing at least one month for approval. The Seismic Survey Management Plan must include the following information in relation to the seismic survey activities:</p> <ul style="list-style-type: none"> <li>a) a description of seismic survey activities</li> <li>b) a description of impacts of seismic survey activities on matters of national environmental significance</li> <li>c) mitigation measures for seismic survey activities</li> <li>d) identification of offsets for residual impacts on at least 115 ha of black throated finch habitat, to be legally secured within two years of commencement of seismic survey activities and managed in accordance with the Biodiversity Offset Strategy under condition 12.</li> </ul>	Compliant	<p>A 3D seismic survey management plan was approved by the Federal Department on 14 June 2015.</p> <p>The 3D seismic activity was never undertaken despite the approval of the plan. Notification of the Federal Department on 13 July 2015 was made confirming this.</p>

Condition no.	Condition	Is the project compliant?	Evidence/Comments
	<p>Note: offset areas identified are not intended to duplicate offset areas identified in accordance with condition 11j.</p>		
21	<p><i>3D seismic survey management plan</i>                      Seismic survey activities must not commence until the 3D Seismic Survey Management Plan has been approved by the Minister in writing. The approved 3D Seismic Survey Management Plan must be implemented.</p>	Compliant	<p>A 3D seismic survey management plan was approved by the Federal Department on 14 June 2015.</p> <p>The 3D seismic activity was never undertaken despite the approval of the plan. Notification of the Federal Department on 13 July 2015 was completed confirming this.</p>
22	<p><i>Groundwater flow model review</i>                      The approval holder must submit to the Minister, within one month of this approval, a peer review of the adequacy of the current groundwater flow model to characterise groundwater impacts. This review must consider the parameters used into the groundwater flow model, the required additional modelling information and the model re-runs outlined in Condition 23. The peer review must be undertaken by a suitably qualified independent expert. The peer review report should identify any additional information requirements.</p>	Compliant	<p>The peer review and accompanying report of the adequacy of the Groundwater Flow Model along with a report was submitted to the Federal Department on 10 November 2015 and was subsequently accepted on 14 March 2016.</p>
23	<p><i>Groundwater flow model review</i>                      The approval holder must provide a report to the Minister for the re-run of the groundwater flow model. The model revisions and re-runs must incorporate the following parameters in the scenarios and address the following additional information requirements:</p> <ul style="list-style-type: none"> <li>a) re-define the current General Head Boundary (GHB) arrangement, as agreed by model domain                             <ul style="list-style-type: none"> <li>i. remove the GHB from its current location in all layers to the western edge of the model domain</li> <li>ii. review and justify the GHB conductance values used in the model to reflect the differences between aquifers and aquitards and also between aquifers (e.g. Clematis and Colinlea Sandstones), and modify if required</li> <li>iii. GHB cell elevations to be re-set using data as agreed by the Department in writing</li> <li>iv. report on the impacts on groundwater levels and net flows between the model domain for the revised GHB boundaries and compare with previous modelling results</li> </ul> </li> </ul>	Compliant	<p>The peer review and accompanying report of the adequacy of the Groundwater Flow Model along with a report was submitted to the Federal Department on 10 November 2015 and was subsequently accepted on 14 March 2016.</p>

Condition no.	Condition	Is the project compliant?	Evidence/Comments
	<ul style="list-style-type: none"> <li>b) review and justify the recharge parameters for the Clematis Sandstone to represent the flux into the recharge beds of the GAB and modify if required</li> <li>c) document outflow mechanisms used in the model layers, using maps to show the spatial distribution of model discharges</li> <li>d) document and incorporate known licensed groundwater extractions within the model domain</li> <li>e) document and justify any other changes made as part of the model re-runs that are not outlined above</li> <li>f) as per the IESC information guidelines provide an assessment of the quality, of and risks and uncertainty inherent in, the data used in the background data and modelling, particularly with respect to predicted potential scenarios</li> <li>g) provide adequate data (spatially and geographically representative) to justify the conceptualisation of topographically driven flow from south to north (and west to east) in both shallow and deeper aquifers</li> </ul>		
24	<p><i>Groundwater flow model review</i></p> <p>The outcomes of the model re-runs are to be reviewed in order to inform the development of the GMMP and the Rewan Formation Connectivity Research Plan and to correct any subsequent inaccuracies in the Matters of National Environmental Significance management plan/s, prior to submitting to the Minister for approval.</p>	Compliant	The peer review and accompanying report of the adequacy of the Groundwater Flow Model along with a report was submitted to the Federal Department on 10 November 2015 and was subsequently accepted on 14 March 2016.
25	<p><i>GAB springs research plan</i></p> <p>At least three months prior to commencing excavation of the first box cut, the approval holder must submit for the approval of the Minister a GAB Springs Research Plan that investigates, identifies and evaluates methods to prevent, mitigate and remediate ecological impacts on the EPBC listed community of native species dependent on natural discharge of groundwater from the Great Artesian Basin (GAB Springs community), including the Doongmabulla Springs Complex, in the Galilee Basin. The GAB Springs Research Plan must include but is not limited to the following:</p> <ul style="list-style-type: none"> <li>a) research aims and rationale with reference to existing scientific research on GAB spring hydrogeology and ecology</li> <li>b) identify priority actions for potential offsets to protect and manage the GAB springs</li> <li>c) personnel responsible for conducting research and their qualifications</li> <li>d) timeframes for research and reporting</li> </ul>	Compliant	<p>The scope of this compliance report does not include commencing excavation of the first box cut.</p> <p>The GAB Springs Research Plan as required under condition 25 was submitted to the Federal Department on 25 July 2018 and is currently being assessed for approval.</p>

Condition no.	Condition	Is the project compliant?	Evidence/Comments
	<p>e) methods, including but not limited to, conceptualisation of the hydrogeology of the springs, geological and geochemical surveys to inform the source aquifer/s for the Doongmabulla Springs Complex, ecological surveys to determine the composition of the GAB springs community, an assessment of transferability of approaches to prevent and mitigate hydrological impact on springs in the Surat Basin, determination of water requirements (including ecological response thresholds) of the GAB springs community, and development and evaluation of methods to prevent, remediate and mitigate ecological impacts</p> <p>f) an analysis of potential mitigation activities, such as but not limited to, re-injection to the groundwater source aquifer to maintain pressure head, flows and ecological habitat at the Doongmabulla Springs Complex</p> <p>g) an explanation of how research outcomes will directly inform the monitoring, management, prevention, mitigation and remediation of impacts on the Doongmabulla Springs Complex</p> <p>h) a peer review of the draft GAB Springs Research Plan, by a suitably qualified independent expert and a table of changes made in response to the peer review</p> <p>i) The GAB Springs Research Plan must be published on the proponent's website for the life of the project. Research outputs must be submitted to the Minister within ten business days of completion, and be made available for the Bioregional Assessment of the Galilee Basin sub-region and the Lake Eyre Basin and any subsequent iterations.</p>		
<p><b>26</b></p>	<p><i>GAB springs research plan</i>                      The approval holder must not commence excavation of the first box cut until the GAB Springs Research Plan has been approved by the Minister in writing. The approved GAB Springs Research Plan must be implemented.</p>	<p>Not triggered</p>	<p>The scope of this compliance report does not include commencing excavation of the first box cut.</p> <p>The GAB Springs Research Plan as required under condition 25 was submitted to the Federal Department on 25 July 2018 and is currently being assessed for approval.</p>
<p><b>27</b></p>	<p><i>Rewan formation connectivity research plan</i>                      At least three months prior to commencing excavation of the first box cut, the approval holder must submit for the approval of the Minister a Rewan Formation Connectivity Research Plan (Rewan Research Plan) that characterises the Rewan Formation within the area impacted by the mine. The Research Plan must be informed by the results of the groundwater flow model re-run (condition 23) and include but not be limited to the following:                      a) research aims</p>	<p>Compliant</p>	<p>The scope of this compliance report does not include commencing excavation of the first box cut.</p> <p>The Rewan Research Plan was developed to meet the requirements of this condition. It was submitted to the Federal Department for assessment on 7 August 2018. The Federal Department are progressing the assessment of the research plan for approval.</p>

Condition no.	Condition	Is the project compliant?	Evidence/Comments
	<p>b) personnel responsible for conducting research and their qualifications</p> <p>c) timeframes for research and reporting</p> <p>d) methods, including, but not limited to, seismic surveys to determine the type, extent and location of fracturing, faulting and preferential pathways (including any fracturing induced by longwall mining subsidence, including any fracturing impacting on the Doongmabulla Springs Complex) and an examination of the hydraulic properties (including but not limited to petrophysical analysis and facies mapping) of the Rewan Formation, to better characterise the Rewan Formation and the contribution of fracturing, faulting and preferential pathways to connectivity, including a description of how research will be undertaken in a manner that does not cause impacts on matters of national environmental significance (unless the activities will be undertaken in accordance with a plan approved pursuant to conditions of this approval)</p> <p>e) an explanation of how research will inform the GMMP, any regional groundwater and surface monitoring and assessment program or Bioregional Assessment for the Galilee Basin sub-region and the Lake Eyre Basin and any subsequent iterations</p> <p>f) a peer review of the Rewan Research Plan, by a suitably qualified independent expert, approved by the Minister in writing, and a table of changes made in response to the peer review.</p>		
<p><b>28</b></p>	<p><i>Rewan formation connectivity research plan</i>                      The approval holder must not commence excavation of the first box cut until the Rewan Research Plan has been approved by the Minister in writing. The approved Rewan Formation Connectivity Research Plan must be implemented.</p>	<p>Not triggered</p>	<p>The scope of this compliance report does not include commencing excavation of the first box cut.</p> <p>The Rewan Research Plan was developed to meet the requirements of this condition. It was submitted to the Federal Department for assessment on 7 August 2018. The Federal Department are progressing the assessment of the research plan for approval.</p>
<p><b>29</b></p>	<p><i>Standard conditions</i>                      Within 30 days of the commencement of the action, the person taking the action must advise the Department in writing of the actual date of commencement.</p>	<p>Compliant</p>	<p>Notification of the commencement of the action (rail) to Federal Department was made on 5 October 2017 with an intended commencement date of 9 October 2017. Subsequent notification was undertaken confirming commencement occurred on 13 October 2017. This is the date of commencement for the purposes of this compliance report.</p>

Condition no.	Condition	Is the project compliant?	Evidence/Comments
			Other activities have also been undertaken however are not commencement.
30	<p><i>Standard conditions</i></p> <p>The person taking the action must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the management plans, reports, and programs required by this approval, and make them available upon 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 the conditions of approval. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media.</p>	Compliant	<p>Numerous mechanisms are in place and include:</p> <ul style="list-style-type: none"> <li>• Use of a stakeholder, compliance and environmental monitoring system</li> <li>• Use of a document management system</li> <li>• Implementation and continual improvement of an ISO14001 certified Environmental Management System.</li> <li>• Monthly status meetings held with the Federal Department to share project updates and progress against conditions.</li> </ul>
31	<p><i>Standard conditions</i></p> <p>Within three months of every 12 month anniversary of the commencement of the action, the approval holder must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of any management plans as specified in the conditions. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to the Department at the same time as the compliance report is published.</p>	Not triggered	This compliance report will be published on the website within the relevant timeframe. However, this falls outside the scope of the current reporting period of this compliance report.
32	<p><i>Standard conditions</i></p> <p>Upon the direction of the Minister, the person taking the action must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister. The independent auditor must be approved by the Minister prior to the commencement of the audit. Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.</p>	Not triggered	The Minister has not requested that an independent audit of compliance with the conditions of the approval is conducted.
33	<p><i>Standard conditions</i></p> <p>Conditions 33, 33A, 33B and 33C are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised plan or strategy to the Minister for approval.</p>	Note	This has not yet occurred.
34	<p><i>Standard conditions</i></p> <p>If the Minister believes that it is necessary or convenient for the better protection of World Heritage properties, National Heritage places, Wetlands of international importance, listed threatened species and communities, listed migratory species, the Great Barrier Reef Marine Park or a water resource, in relation to coal seam gas development and large coal mining development to do so, the Minister may request that the person taking the action make</p>	Note	This has not yet occurred.

Condition no.	Condition	Is the project compliant?	Evidence/Comments
	<p>specified revisions to the management plans, reports, and programs specified in the conditions and submit the revised management plans, reports, and programs for the Minister's written approval. The person taking the action must comply with any such request. The revised approved management plans, reports, and programs must be implemented. Unless the Minister has approved the revised management plans, reports, and programs, then the person taking the action must continue to implement the management plans, reports, and programs originally approved, as specified in the conditions.</p>		
<p><b>35</b></p>	<p><i>Standard conditions</i>                      If, at any time after 10 years from the date of this approval, the person taking the action has not substantially commenced the action, then the person taking the action must not substantially commence the action without the written agreement of the Minister.</p>	<p>Compliant</p>	<p>Notification of the commencement of the action (rail) to Federal Department was made on 5 October 2017 with an intended commencement date of 9 October 2017. Subsequent notification was undertaken confirming commencement occurred on 13 October 2017. This is the date of commencement for the purposes of this compliance report.</p> <p>Other activities have also been undertaken however are not commencement. This includes exploratory activities undertaken for the mine component of the approved action and included the installation of groundwater monitoring bores, exploratory drilling to investigate groundwater flow rates and the preparation of additional access tracks and pads. Exploratory activities do not meet the definition of mining operations and the works did not impact any Matters of National Environmental Significance. The Federal Department were notified of these works on 17 November 2017.</p>
<p><b>36</b></p>	<p><i>Standard conditions</i>                      Unless otherwise agreed to in writing by the Minister, the person taking the action must publish all management plans, reports, and programs referred to in these conditions of approval on their website. Each management plan, report, and program must be published on the website within one month of being approved.</p>	<p>Compliant</p>	<p>The following plans were observed to be published on Adani's website:</p> <ul style="list-style-type: none"> <li>• SMP for mine and offsite dated May 2016</li> <li>• SMP for SP1 dated May 2016</li> <li>• BOS dated October 2016</li> <li>• GAB Offset Strategy dated July 2016</li> <li>• Groundwater flow model review dated November 2014</li> </ul>

6. **NEW ENVIRONMENTAL RISKS**

No new environmental risks have been identified during the reporting period.