






REPORT
ACCESS AND APPROVALS
MS1184 Compliance Assessment Report

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1. Introduction

This Compliance Assessment Report (CAR) is submitted by APA Northern Goldfields Interconnect Pty Ltd, an entity of the APA Group (herein referred to as APA) as per Condition 9-6 of Ministerial Statement 1184 (MS1184) regarding the Northern Goldfields Interconnect (NGI) pipeline. This report covers a reporting period of 2nd February 2022 to 31st December 2022.

Proposal: The proposal is to construct and operate a 580 kilometre pipeline, starting from Ambania (50 km east of Geraldton) to 40km south of Leinster where it will connect into the existing Goldfields Gas Pipeline. The proposal includes associated aboveground infrastructure, such as a compressor station at Ambania and other stations such as valve stations, scraper stations, at various locations along the pipeline.

MS1184 was published on 2nd February 2022. This is the first CAR submitted for MS1184.


2. Summary of Activities Completed

During this CAR reporting period, construction activities commenced in April 2022 for the pipeline, compressor station and other stations. Vegetation clearing associated with the Proposal was predominantly completed within this period. The offtake and compressor station construction was nearing completion, mainline welding, coating and trenching was over 85% complete and reinstatement was approximately 40% complete. All horizontal directional drilling was completed and hydrotesting was completed for the first three (3) of 13 thirteen test sections.

3. Statement of Compliance to Conditions of MS1184

This Compliance Assessment Report is submitted by APA Northern Goldfields Interconnect Pty Ltd (The Proponent) in accordance with Condition 9-6 of Ministerial Statement 1184.

The Proponent is compliant with the Conditions of Ministerial Statement 1184, with the exception of the previously reported non-compliances detailed in Table 1.

Signed: 

Name: Lisa Dumbrell
Authorised delegate for Chief Executive Officer
APA Group

Date: 2 May 2023

4. Summary of Audit and Inspections

The auditing methodology for this report follows the compliance assessment process as described in Section 2 of the Compliance Assessment Plan (CAP). Regular assessments against MS1184 Conditions were undertaken during the reporting period, incorporating relevant findings from internal and external audits. The Compliance Assessment Audit Table is provided in Table 2.

Regular inspection processes of construction areas within the approved development envelope were undertaken by Contractors and APA supervisors familiar with MS1184 requirements. Where inspections identified environmental or cultural heritage management deficiencies, these were captured and corrective actions tracked until completion.

Where Contractor performance did not reflect MS1184 expectations, incidents notifications were raised, and if appropriate, Non-Conformance Reports were utilised to contractually escalate if not timely resolved to APA satisfaction.

5. Non-Conformances

5.1 Reportable

APA reported potential non-compliances in accordance with the requirements of the *Post Assessment Guideline for Preparing a Compliance Assessment Plan* (EPA, 2012). These records of potential non-compliances were provided to the CEO in accordance with Conditions of MS1184.

5.2 Non-conformance Report

Potential non-compliances have been detailed in Table 1, along with descriptions of corrective and preventative actions taken. Details of non-conformances include the information required in Section 3 of *Post Assessment Form 2 - Statement of Compliance* (EPA, 2018).

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Table 1: Summary of MS1184 Compliance for Reporting Period 2nd February 2022 – 31st December 2022.

Ministerial Condition	Date & Location	Details of potential non-compliance	Extent of the non-compliance Extent of impact from the non-compliance	Cause of the non-compliance, Measures already in place to prevent the non-compliance, Amendments to measures in place to improve performance, and Remedial or corrective actions taken or proposed.
1184:4-7	May 2022 KP0 – KP141	Non-achievement of Cultural Heritage Management Plan management (CHMP) actions. The Relationship Agreement was not executed for Yamatji Native Title Traditional Owners prior to commencement of construction in their area as defined in the Cultural Heritage Management Plan Performance Standards.	There is no identified impact associated with the delay in execution of this Relationship Agreement.	Ministerial Statement assessment identified that the execution of the Relationship Agreement had not been completed. APA continues to conduct activities in accordance with the draft Relationship Agreement and remains engaged with the Yamatji Native Title Traditional Owners on the execution of a Relationship Agreement. APA received agreement in principle to execute the prepared Relationship Agreement through Board endorsement in September 2021 and subsequently received consent to proceed with construction activities in April 2022. The main tool to protect and manage areas of cultural heritage significance is the CHMP. Works were only undertaken by APA in areas of cultural heritage significance in accordance with the CHMP developed in consultation with, and endorsed by Yamatji Native Title Traditional Owners. Yamatji Native Title Traditional Owners continued to support the project through assistance with cultural heritage surveys, environmental audit, the provision of cultural heritage monitors to facilitate implementation of the CHMP and ongoing general consultation.
1184:2-5	22 nd June 2022 KP38	Fauna shelters were placed in the trench at intervals greater than fifty (50) metres.	No fauna identified in trenches at this time and location.	Audit identified trenching completed in previous 24 hours had no fauna shelters installed. Contractor installed fauna shelters upon identification. Requirements reinforced with the special crossings crew undertaking trenching.
1184:2-1	16 th - 19 th August 2022 KP00 – KP150	Daily fauna inspections of trenches unable to be undertaken	Approximately 30km of trenches were temporarily inaccessible. No identified variation in fauna mortality rates	Over 60mm of rainfall was received in a short period. Road closures and inundation of construction access resulted in inability to safely access open trenches. In preparation of the forecasted rainfall event, fauna handlers established additional fauna management controls in the event of water egress. These included; • Provision of materials (e.g. branches, skids, rolls of rock guard) positioned on angles within the trench to act as refuge and fauna ladders

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				<ul style="list-style-type: none"> • Provision of additional trench plugs • Provision of stacks of sawdust bags to provide higher refuge location • Provision of hessian saw dust bags supported by flotation devices tied off to prevent floating away, to act as temporary floating refuge. <p>Dispensation was sought from local governments for fauna inspection access with light vehicles on otherwise closed local roads for future significant rain events.</p>
1184:2-1	3 rd - 4 th September 2022 KP41 - KP164	Daily fauna inspections of trenches unable to be undertaken	<p>Approximately 30kms of trenches were temporarily inaccessible.</p> <p>No identified variation in fauna mortality rates</p>	<p>Over 50mm of rainfall was received in a short period. Road closures and inundation of construction access resulted in inability to safely access open trenches.</p> <p>Preparation taken for the previous rainfall event were still in place at the time of this rainfall event as the construction workforce had been predominantly demobilised due to expected rainfall and scheduled construction days off.</p> <p>Water over access roads were pumped off where possible to reduce period without vehicle access.</p>
1184:2-5	19 September 2022 KP159 – KP231	Fauna shelters were placed in the trench at intervals greater than fifty (50) metres.	No identified variation in fauna mortality rates	<p>Supervisor inspection identified a 6km section of trench without any fauna shelters, and several section of trenches with fauna shelters spaced 100m apart. Upon identification and return to office, a notice was issued to Contractor to cease further trenching activities until the fauna requirements were met. A subsequent Contractor Default Notice was issued.</p> <p>Corrective actions were implemented the following morning and inspected by APA prior to commencement of further trenching activities on 20th September 2022. Statutory fauna requirements recommunicated to construction personnel. Contractor indicated that availability of suitable materials was a contributing factor to this event.</p> <p>There was no demonstrated change in fauna mortality records observed as a result of this temporary absence and reduction in fauna shelters.</p>
1184:4-7	September 2022 KP558 – KP580	<p>Non-achievement of Cultural Heritage Management Plan management actions.</p> <p>The Relationship Agreement was not executed for Darlot Native Title Traditional Owners prior to</p>	There is no identified impact associated with the delay in execution of a Relationship Agreement.	<p>Ministerial Statement assessment identified that the execution of the Relationship Agreement had not been completed.</p> <p>APA continues to conduct activities in accordance with the draft Relationship Agreement and remains closely engaged with the Darlot Native Title Traditional Owners on the execution of a Relationship Agreement. The main tool to protect and manage areas of cultural heritage significance is the CHMP. Works were only undertaken by APA in areas of</p>

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		commencement of construction in their area as defined in the Cultural Heritage Management Plan Performance Standards.		<p>cultural heritage significance in accordance with the CHMP management actions developed in consultation with, and endorsed by Darlot Native Title Traditional Owners.</p> <p>Darlot provided consent for construction commencement and continue to support the project through assistance with cultural heritage surveys, the provision of cultural heritage monitors to facilitate implementation of the CHMP and ongoing general consultation.</p>
1184:4-7	24 th October 2022	<p>Non-achievement of Cultural Heritage Management Plan management action.</p> <p>Frequency of documented communications of cultural awareness notifications less than minimum monthly requirement.</p>	No identified impact.	<p>Audit identified an absence of evidence for this management target. Contractor actions included the collation and provision of additional evidence following the audit finding demonstrating regular communication of cultural awareness notifications.</p> <p>Additionally, the Contractor developed a Cultural Heritage Awareness Register to ensure clearer record of management of the requirement.</p>
1184:4-7	Reported 11 th November 2022	<p>Non-achievement of Cultural Heritage Management Plan management action.</p> <p>Induction materials did not highlight CHMP and cultural heritage value controls as identified in the CEP, including obligations under the Aboriginal Heritage Act WA 1972 (WA)</p>	No identified impact.	<p>A potential non-compliance with the CHMP targets was reported following an audit that identified that obligations under the Aboriginal Heritage Act WA 1972 (WA) were not sufficiently detailed within a Contractors induction material.</p> <p>Upon further review, it is noted that this requirement was a commitment made within the CHMP, rather than a management action. Accordingly, this is not a non-compliance under MS1184. Regardless, the induction materials were updated accordingly. No further action is planned under MS1184.</p>
1184:10-2	Reported 11 th November 2022	The Cultural Heritage Management Plan was redacted prior to public release without request for approval from the CEO.	No identified impact.	<p>Ministerial Statement assessments identified that the CHMP was publicly released containing redactions after its approval in April 2022.</p> <p>Redaction was undertaken for reasons of cultural sensitivity, including specific locations and descriptions of the cultural heritage sites. This intent was to protect the sites through only sharing relevant information publicly, and to avoid unnecessary anguish with traditional owners who share information only as a means to protect their cultural heritage.</p> <p>No further actions were identified following reporting.</p>
1184:4-6, 1184:4-7,	Reported 11 th November 2022	Non-Compliance with requirements for non-compliance reporting	No identified impact associated with delay	Ministerial Statement assessments identified that notifications to the CEO was not undertaken within required timeframes for several potential non-

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1184:9-5		timeframes.	in reporting.	conformances. Although the potential non-conformances were captured within APAs incident reporting system, some external reporting timeframe requirements were not identified at the time of capture. Familiarity with reporting timeframes was reinforced with relevant personnel.
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6. Rehabilitation and Monitoring

During the CAR reporting period, mainline rehabilitation works had been completed for 40% of the mainline disturbed areas in accordance with the Rehabilitation Plan. It is expected that all disturbed areas not required for ongoing operational requirements will be rehabilitated within the following reporting period.

Additionally, a Defect Liability Program is currently under development for implementation following practical completion of the mainline component of the Proposal. This program will include some components of ongoing rehabilitation monitoring.

7. Consultation

In accordance with the Compliance Assessment Plan and Condition 10-1 of MS1184, this CAR will be made publicly available within one month being submitted to DWER.

Throughout the reporting period of the CAR, APA continued liaison with key stakeholders in accordance with commitments made within the CHMP.

8. Conclusion

This CAR documents the extent to which the MS1184 conditions have been met and allows assessment on whether management strategies are effective in meeting the conditions of MS1184.

Following the completion of this compliance assessment, APA has ascertained that the proposed outcomes to which conditions within Ministerial Statement 1184 were established, have been achieved.

APA notes that resolution of findings relating to a management action supporting the Cultural Heritage Management Plan (1184:M4-7) remains outstanding. APA continues liaison with two Native Title Traditional Owner groups to finalise the relevant Relationship Agreements, noting that the Performance Standards required that 'Relationship agreements in place with Native Title and Traditional Owner representatives prior to commencement of construction in their respective areas'.

Outside of the aforementioned CHMP findings, planned actions to rectify potential non-conformances have been implemented and no further actions are planned.

Overall, APA believes that the management strategies have been effective in meeting the proposed outcomes of the Proposal, with the potential non-compliances to conditions of MS1184 having no demonstrated negative environmental or cultural heritage impacts. APA believes that all significant environmental aspects are adequately addressed, in accordance with the requirements of MS1184, the CHMP and the CAP.

Future revisions to the Compliance Assessment Plan may be considered to reflect the changing Proposal status from construction to operational status.

Table 2. Compliance Assessment Audit Table

Audit Code	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
Proposal Implementation							
1184:M1.1	When implementing the proposal, the proponent shall ensure the proposal does not exceed the following extents: Development Envelope: Up to 12,404 hectares; Direct disturbance of native vegetation: Up To 1,930 hectares.	<ul style="list-style-type: none"> Compliance assessment: daily work inspections, weekly site inspections, project audits, reinstatement completion checks. As-built surveys completed and verify direct disturbance of no more than 1,930 ha within the 12,404 ha development envelope Reconciliation of mapping 	<ul style="list-style-type: none"> Compliance Assessment Report As-built survey records Mapping 	Overall	Ongoing – Construction disturbance predominantly completed by January 2023	Compliant	Vegetation clearing predominantly complete, direct disturbance to be confirmed by as-built survey data and reconciliation mapping following completion of construction activities. High resolution photography expected to assist complete assessment of vegetation disturbance and support development of as-built records
Terrestrial Fauna							
1184:2.1	Trapped fauna within open trenches shall be cleared and recorded by a suitably trained and licensed fauna handler no later than three (3) hours after sunrise each day, and the clearing and recording shall be repeated before sunset each day.	<ul style="list-style-type: none"> Implement Construction Environment Plan, which includes the following regarding trench inspections: <ul style="list-style-type: none"> Morning and evening visual trench inspections undertaken and recorded. First clearing shall be completed by no later than three hours after sunrise; Second clearing shall occur between the hours of 3-6 pm; and During extreme temperatures (35°C or above) consideration will be given to undertaking fauna inspections at midday. The open trench will be checked for fauna within one (1) hour prior to backfilling and any trapped animals will be removed and recorded. Compliance assessment: daily work inspections, weekly site inspections, project audits. Fauna Management Report Minimum of one fauna handler per 10 km of open trench. Any pooled rainwater in trenches will be pumped out following fauna clearing Fauna shelters (e.g. hessian bags) placed a minimum of approximately every 50 m in open trench. Fauna shelters will be placed at more regular intervals where the trench is adjacent or in close proximity to 	<ul style="list-style-type: none"> Compliance Assessment Report Fauna Management Report Trench fauna inspection records 	Construction	Ongoing – Mainline trench backfilled by December 2022 Special crossings trenching and bell holes remaining.	Non - Compliant	Temporary rainfall impediments to daily inspections captured in Table 1. At time of reporting, APA awaiting trench fauna inspection records from Contractor to complete Fauna Management Report. As of 16 th December 2022, fauna mortality rates were recorded at 4.34%, with over 10,000 animals removed from the trenches.
1184:2.2	Trapped fauna within open trenches shall be cleared and recorded by a suitably trained and licensed fauna handler within one (1) hour prior to backfilling of trenches.					Compliant	
1184:2.3	Open trench lengths shall not exceed a length capable of being inspected and cleared by a suitably trained and licensed fauna handler within the required times set out in conditions 2-1 and 2-2.					Compliant	
1184:2.4	In the event of rainfall, the proponent shall, following the clearing of fauna from the trench, pump out any pooled water in the open trench (with the exception of groundwater) and discharge it to adjacent vegetated areas in a manner that does not cause erosion					Compliant	
1184:2.5	Fauna shelters are to be placed in the trench at intervals not exceeding fifty (50) metres.					Non - Compliant	

Audit Code	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		suitable Eucalypt woodland habitat for the Western Spiny-tailed Skink.					
1184:2.6	The proponent shall produce and provide a report on fauna management within the pipeline corridor no later than twenty-one (21) days after the completion of construction activities to the CEO. The report shall include the following: (1) details of fauna inspections; (2) the number and type of fauna cleared from trenches and actions taken; and (3) vertebrate fauna mortalities.	<ul style="list-style-type: none"> Prepare and submit Fauna Management Report Compliance assessment: daily work inspections, weekly site inspections, project audits. 	<ul style="list-style-type: none"> Fauna Management Report Record of submission of Fauna Management Report Trench fauna inspection records Compliance Assessment Report 	Construction	No later than 21 days after the completion of construction activities.	Compliant	Construction activities were continuing at the time of CAR submission. APA currently awaiting trench fauna inspection records from Contractor to complete Fauna Management Report. As of 16 th December 2022, fauna mortality rates were recorded at 4.34%, with over 10,000 animals removed from the trenches.
Eucalypt Woodlands of the Western Australian Wheatbelt and Carnaby's Cockatoo Habitat							
1184:M3.1	The proponent shall ensure the following outcomes are achieved: (1) no more than 0.28 ha of direct impacts to the Eucalypt Woodlands of the Western Australian Wheatbelt community, as mapped by Focused Vision Consulting and shown in Figure 2; (2) no more than 0.25 ha of direct impacts to foraging habitat for Carnaby's cockatoo (<i>Calyptorhynchus latirostris</i>), as shown in Figure 3; and (3) no direct or indirect impacts to threatened flora species <i>Eucalyptus beardiana</i> .	<ul style="list-style-type: none"> Implement Construction Environment Plan Protection of conservation significant flora, vegetation, and fauna habitat which has not been authorised for clearing from direct impacts by: <ul style="list-style-type: none"> Establishing temporary exclusion zones, Marking vegetation to be retained with flagging, Delineating construction boundaries on drawings, Communicating clearing areas in pre-start and inductions; Environmental line list highlights location of significant flora and vegetation, and Dedicated environmental supervision of clearing works during the intersection of the Eucalypt woodlands TEC/PEC locations. Compliance assessment: daily work inspections, weekly site inspections, project audits. As-built surveys 	<ul style="list-style-type: none"> Construction Environment Plan Inspection/audit reports, incident/corrective action registers and complaints registers verify no unauthorised disturbance to areas of important vegetation and habitat or their exclusion zones Compliance Assessment Report As-built surveys completed and verify: <ul style="list-style-type: none"> clearing of the Eucalypt Woodlands TEC/PEC does not exceed 0.28 ha; clearing of foraging habitat for Carnaby's cockatoo (<i>Calyptorhynchus latirostris</i>) does not exceed 0.25 ha; and no clearing of <i>Eucalyptus beardiana</i>. 	Overall	Ongoing – Compliance assessment against direct and indirect impacts expected to be undertaken in Q2 2023.	Compliant	No evidence of unauthorised disturbance to areas of significant vegetation and habitat or their exclusion zones has been identified as part of ongoing audits and inspections. As-Built Survey data expected to be received for verification in Q2 2023.
1184:M3.1	During the construction of the proposal, the proponent shall avoid project attributable indirect impacts to: (1) the Eucalypt Woodlands of the Western Australian Wheatbelt community, as shown in Figure 2, except to the areas authorised to be cleared in condition 3-1(1); and (2) foraging habitat for Carnaby's cockatoo	<ul style="list-style-type: none"> Implement Construction Environment Plan Protection of conservation significant flora, vegetation, and fauna habitat which has not been authorised for clearing from direct impacts by: 	<ul style="list-style-type: none"> Construction Environment Plan Compliance Assessment Report 	Construction	Ongoing – Compliance assessment against direct and indirect impacts expected to be	Compliant	No evidence of unauthorised disturbance to areas of significant vegetation and habitat or their exclusion zones has been identified as part of ongoing audits and inspections. As-Built Survey data expected to be received for verification in Q2 2023.

Audit Code	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
	<i>(Calyptorhynchus latirostris)</i> , as shown in Figure 3, except to the areas authorised to be cleared in condition 3-1(2).	<ul style="list-style-type: none"> Establishing temporary exclusion zones, Marking vegetation to be retained with flagging, Delineating construction boundaries on drawings, Communicating clearing areas in pre-start and inductions; Environmental line list highlights location of significant flora and vegetation, and Dedicated environmental supervision of clearing works in the vicinity of the Eucalypt woodlands TEC/PEC locations. <ul style="list-style-type: none"> Compliance assessment: daily work inspections, weekly site inspections, project audits, reinstatement completion checks. 			undertaken in Q2 2023.		
Cultural Heritage Management Plan							
1184:M4.1	<p>The proponent must implement the proposal to meet the following objective:</p> <p>(1) avoid, where possible, and otherwise minimise, project attributable direct and indirect impacts to social, cultural, heritage and archaeological values within and surrounding the development envelope, including from, but not limited to:</p> <p>(a) disturbance of the ground that may impact registered Aboriginal heritage sites;</p> <p>(b) potential loss of access to areas to undertake traditional activities; and</p> <p>(c) indirect impacts to social and cultural places, and activities.</p>	<ul style="list-style-type: none"> Implement Cultural Heritage Management Plan Compliance assessment: daily work inspections, weekly site inspections, project audits, reinstatement completion checks. 	<ul style="list-style-type: none"> Cultural Heritage Management Plan Compliance Assessment Report 	Overall	Ongoing	Compliant	<p>Project has been undertaken in consultation with traditional owners to incorporate their preferred approach to heritage sites, access to traditional activities and indirect impacts to cultural places.</p> <p>Audits and inspections have not identified any non-conformances.</p>
1184:M4.2	Prior to construction activities, the proponent shall finalise and submit a Cultural Heritage Management Plan, in consultation with relevant traditional owner groups and appropriate knowledge-holders, to meet the objective specified in condition 4-1.	<ul style="list-style-type: none"> Prepare and submit Cultural Heritage Management Plan that includes: <ul style="list-style-type: none"> Cultural Heritage Management Procedures, Cultural Heritage Management Processes, Management measures, Monitoring, Implementation verification, and Reporting. Written correspondence Compliance assessment: daily work inspections, weekly site 	<ul style="list-style-type: none"> Cultural Heritage Management Plan Record of submission of Cultural Heritage Management Plan Compliance Assessment Report Copy of records of consultation with relevant traditional owner groups and appropriate knowledge-holders, 	Pre-construction	Closed – required prior to construction activities.	Completed	Northern Goldfields Interconnect Pipeline Cultural Heritage Management Plan Revision 4 CHMP submitted 11th April 2022, approval received from ED EPA Services 14th April 2022.
1184:M4.3	<p>The Cultural Heritage Management Plan required by condition 4-2 must:</p> <p>(1) specify the objective to be achieved, as specified in condition 4-1;</p> <p>(2) specify risk-based management actions that will be implemented to demonstrate compliance with the objective specified in condition 4-1;</p> <p>(3) include a framework for ongoing consultation with the relevant traditional owners and other relevant stakeholders during the life of the proposal;</p> <p>(4) include a procedure, in the instance of any previously unrecorded heritage places being identified</p>						

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Audit Code	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
	<p>within the development envelope, to avoid the area and must contact the relevant traditional owners and the Department of Planning, Lands and Heritage within ten (10) days of discovery, prior to implementing mitigation actions required;</p> <p>(5) include a procedure to ensure that management, staff and contracting personnel are made fully aware of their obligations in the Cultural Heritage Management Plan approved by the CEO, and under the Aboriginal Heritage Act 1972;</p> <p>(6) specify measurable management target(s) to determine the effectiveness of the risk-based management actions in condition 4-3(2);</p> <p>(7) specify monitoring to measure the effectiveness of management actions against management targets;</p> <p>(8) specify a process for revision of management actions and changes to proposal activities, in the event that the management targets are not achieved. The process must include an investigation to determine the cause of the management target(s) not being met;</p> <p>(9) provide the format and timing to demonstrate that condition 4-1 has been met for the reporting period in the Compliance Assessment Report required by condition 9-6 including, but not limited to:</p> <p>(a) verification of the implementation of management actions; and</p> <p>(b) reporting on the effectiveness of management actions against management target(s) (10) provide evidence of consultation required by condition 4-2 and the outcomes of this consultation</p>	<p>inspections, project audits.</p> <ul style="list-style-type: none"> Records of consultation with relevant traditional owner groups and appropriate knowledge-holders 					
1184:M4.4	Construction activities may not commence until the proponent has received notice in writing from the CEO that the Cultural Heritage Management Plan satisfies the requirements of condition 4-3	<ul style="list-style-type: none"> Written correspondence Compliance assessment 	<ul style="list-style-type: none"> Copy of letter from the CEO advising that the Cultural Heritage Management Plan satisfies the requirements of condition 4-3 Compliance Assessment Report 	Pre-construction	Closed—required prior to construction activities.	Completed	<p>CHMP approval received from ED EPA Services 14th April 2022.</p> <p>Pipeline Contractor site survey works commenced 23rd April 2022.</p>
1184:M4.5	<p>After receiving notice in writing from the CEO that the Cultural Heritage Management Plan satisfies the requirements of condition 4-3, the proponent must:</p> <p>(1) implement the provisions of the Cultural Heritage Management Plan; and</p> <p>(2) continue to implement the Cultural Heritage Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated the objective specified in condition 4-1 has been met.</p>	<ul style="list-style-type: none"> Implement the Cultural Heritage Management Plan 	<ul style="list-style-type: none"> Cultural Heritage Management Plan Compliance Assessment Report 	Overall	Ongoing	Compliant	APA has implemented, and continues to implement the CHMP.
1184:M4.6	<p>In the event that monitoring, tests, surveys or investigations indicate nonachievement of management target(s) specified in the Cultural Heritage Management Plan, the proponent must:</p> <p>(1) report the non-achievement in writing to the CEO within twenty-one (21) days of the non-achievement being identified;</p> <p>(2) investigate to determine the cause of the management target(s) not being achieved;</p> <p>(3) provide a report to the CEO within ninety (90) days of the non-achievement being reported as required by</p>	<ul style="list-style-type: none"> Compliance assessment: daily work inspections, weekly site inspections, project audits. Written correspondence 	<ul style="list-style-type: none"> Compliance Assessment Report Copy of letter to CEO reporting the non-achievement Copy of letter/email and report to the CEO providing results of the investigation into the non-achievement and any additional management measures 	Overall	<p>Report the non-achievement in writing to the CEO within 21 days of the non-achievement being identified.</p> <p>Provide a report on the non-achievement to</p>	Compliant	No non-achievements of management targets (identified as Performance Objectives in Table 4 of the CHMP) have been identified through audits and inspections.

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	condition 4-6(1). The report must include: (a) cause of management target(s) being exceeded; (b) the findings of the investigation required by condition 4-6(2); (c) details of revised and/or additional management actions to be implemented to prevent non-achievement of the management target(s); and (d) relevant changes to proposal activities.					the CEO within 90 days of the non-achievement being identified.	
1184:M4.7	In the event that monitoring, tests, surveys or investigations indicate that one or more management action(s) specified in the Cultural Heritage Management Plan have not been implemented, the proponent must: (1) investigate to determine the cause of the management action(s) not being implemented; (2) investigate to provide information for the CEO to determine potential environmental harm or alteration of the environment that occurred due to the failure to implement management action(s) to meet the objective specified in condition 4-1; (3) provide a report to the CEO within twenty-eight (28) days of the nonachievement of the objective specified in condition 4-1 being identified. The report must include: (a) cause for failure to implement management actions(s); (b) the findings of the investigation required by condition 4-7(2); (c) relevant changes to proposal activities; and (d) measures to prevent, control or abate the environmental harm which may have occurred from the non-achievement of the objective specified in condition 4-1.	<ul style="list-style-type: none"> Implement Cultural Heritage Management Plan Compliance assessment: daily work inspections, weekly site inspections, project audits. Written correspondence 	<ul style="list-style-type: none"> Cultural Heritage Management Plan Compliance Assessment Report Copy of letter/email and report to the CEO providing results of the investigation into the non-achievement and any additional management measures 	Overall	Provide a report on the non-achievement to the CEO within 28 days of the non-achievement being identified.	Non - Compliant	As detailed in Table 1, four (4) non-achievements of management actions (identified as Performance Standards in Table 4 of the CHMP) have been identified and reported upon identification.
1184:M4.8	The proponent: (1) may review and revise the Cultural Heritage Management Plan; or (2) must review and revise the Cultural Heritage Management Plan as and when directed by the CEO.	<ul style="list-style-type: none"> Written correspondence, if received Submit new revision of the Offset Strategy, if relevant. 	<ul style="list-style-type: none"> Copy of letter from CEO directing changes be made to the Cultural Heritage Management Plan where this has occurred. Record of submission of a new revision of the Cultural Heritage Management Plan, if relevant. 	Overall	N/A	Noted – no current actions required	N/A
1184:M4.9	The proponent must implement the latest revision of the Cultural Heritage Management Plan required by condition 4-2, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 4-3.	<ul style="list-style-type: none"> Implement Cultural Heritage Management Plan Compliance assessment Written correspondence 	<ul style="list-style-type: none"> Cultural Heritage Management Plan Compliance Assessment Report Copy of letter from the CEO advising that the Cultural Heritage Management Plan satisfies the requirements of condition 4-3 	Overall	Ongoing	Compliant	CHMP Revision 4 approval received from ED EPA Services 14 th April 2022.
Revegetation							
1184:M5.1	The proponent shall undertake progressive revegetation of areas disturbed by construction activities within the development envelope to ensure it is self-sustaining.	<ul style="list-style-type: none"> Prepare and implement Rehabilitation Plan that includes: 	<ul style="list-style-type: none"> Rehabilitation Plan Compliance Assessment Report 	Overall	Ongoing - Within 6 months	Compliant	A Rehabilitation (Reinstatement) Plan has been developed for use. Rehabilitation of the main line area was reported at ~40% complete

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1184:M5.2	The proponent shall ensure that progressive revegetation of areas required by condition 5-1 includes: (1) retaining the vegetative material and topsoil removed by clearing and stockpiling the vegetative material and topsoil within the development envelope; (2) At an optimal time within six (6) months following completion of construction activities, revegetate the areas cleared for construction activities, by: (a) ripping the ground on the contour to remove soil compaction; (b) laying the vegetative material and topsoil retained under condition 5-2(1) on the disturbed areas that are no longer required.	<ul style="list-style-type: none"> ○ Progressive revegetation, ○ Retention of vegetation and topsoil, and ○ Ripping and laying of vegetative material within six months of completion of construction activities. ● Compliance assessment: daily work inspections, weekly site inspections, project audits, reinstatement completion checks. ● Post-construction monitoring: monthly aerial monitoring, annual terrestrial inspections. 			following completion of construction activities.		at the end of the CAR reporting period (31 st December). Construction activities continue at the time of the CAR submission and are expected to be completed in Q2 2023.
1184:M5.3	The proponent shall demonstrate that conditions 5-2(1) and 5-2(2) have been met for the reporting period in the Compliance Assessment Report required by condition 9-6.	<ul style="list-style-type: none"> ● Compliance assessment: daily work inspections, weekly site inspections, project audits, reinstatement completion checks. 	<ul style="list-style-type: none"> ● Compliance Assessment Report 	Overall	Ongoing	Compliant	Audits and inspections undertaken within the reporting period confirmed that rehabilitation was undertaken in accordance to MS1184 Conditions.
1184:M5.4	The proponent shall report to the CEO six (6) years post construction on the outcomes of the revegetation required to be undertaken in condition 5-1, and: (1) should the objective in condition 5-1 not be met, the proponent shall undertake planting as a contingency action, ensuring only local provenance propagating materials are used to revegetate the area.	<ul style="list-style-type: none"> ● Implement Rehabilitation Plan ● Compliance assessment 	<ul style="list-style-type: none"> ● Rehabilitation Plan ● Compliance Assessment Report 	Overall	6 years post construction.	Compliant	This Condition is not yet applicable.
Offsets							
1184:M6.1	The proponent shall implement offset measures to achieve the objective of counterbalancing the significant residual impact to 0.25 ha of foraging habitat for Carnaby's cockatoo (<i>Calyptorhynchus latirostris</i>), as shown in Figure 3.	<ul style="list-style-type: none"> ● Implement Offset Strategy ● Compliance assessment 	<ul style="list-style-type: none"> ● Offset Strategy ● Compliance Assessment Report 	Overall	Ongoing	Compliant	Development of offset strategy ongoing.
1184:M6.2	Within twelve (12) months from the date of this Statement the proponent shall prepare and submit an offset strategy to the requirements of the CEO.	<ul style="list-style-type: none"> ● Prepare and submit an Offset Strategy that includes: <ul style="list-style-type: none"> ○ That the objective of Condition 6-1 will be met ○ Details of any Proposed Offset Conservation Areas ○ How the Proposed Offset Conservation Areas will counterbalance the significant residual environmental impact ○ Details of any proposed land acquisition ○ Details of any proposed on-ground management 	<ul style="list-style-type: none"> ● Offset Strategy ● Record of submission of Offset Strategy 	Overall	By 2 February 2023.	Compliant	The date of submission did not fall within this CAR reporting period. The proposed offset strategy was submitted on 1 st February 2023. Advice received from DWER 4 th April 2023 requesting amendments to proposed offset strategy approach. APA requested to provide a revised submission date prior to 12 th May 2023.
1184:M6.3	The offset strategy shall: (1) demonstrate that the objective in condition 6-1 will be met; (2) identify any area(s) to be acquired and/or for on-ground management (Proposed Offset Conservation Area), which contains the environmental values identified in condition 6-1, or similar values of equivalent conservation significance agreed by the CEO; (3) demonstrate how the proposed offset counterbalances the significant residual impact to the environmental value identified in condition 6-1 through application of the principles of the WA Environmental Offsets Policy (2011) and completion of the WA Offsets Template and the EPBC Act Offset assessment guide (the calculator) as described in the WA Environmental Offsets Guidelines (2014), and the Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy Assessment Guide						

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	<p>(2012), or any subsequent revisions of these documents;</p> <p>(4) specify, if land acquisition is proposed:</p> <p>(a) how the Proposed Offset Conservation Area will be acquired;</p> <p>(b) a timeframe and works associated with establishing the Proposed Offset Conservation Area, including plans for maintaining the offset for at least twenty (20) years after completion of purchase; and</p> <p>(c) each relevant management body for the on-going management of the Proposed Offset Conservation Area, including its role, and confirmation in writing that the relevant management body accepts responsibility for its role.</p> <p>(5) specify, if on-ground management is proposed:</p> <p>(a) state the targets to be achieved, including completion criteria, which result in a tangible improvement to the environmental value being offset;</p> <p>(b) demonstrate the consistency of the objective/s and target/s with the objectives of the National Recovery Plans for Carnaby's cockatoo (<i>Calyptorhynchus latirostris</i>), or any subsequent revision of this plan;</p> <p>(c) detail the on-ground management actions with associated timeframes for implementation, to achieve the objective/s and target/s identified in condition 6-3(5)(a); and</p> <p>(d) detail the monitoring, reporting and evaluation mechanisms for the objective/s, target/s and actions identified under conditions 6-3(5)(a) and 6-3(5)(c).</p>						
1184:M6.4	<p>The proponent:</p> <p>(1) may review and revise the offset strategy; or</p> <p>(2) review and revise the offset strategy as and when directed by the CEO by a notice in writing, to the requirements of the CEO.</p>	<ul style="list-style-type: none"> Written correspondence Submit new revision of the Offset Strategy, if relevant. 	<ul style="list-style-type: none"> Copy of letter from CEO directing changes be made to the Offset Strategy where this has occurred. Record of submission of a new revision of the Offset Strategy, if relevant. 	Overall	Ongoing	Noted– no current actions required	N/A
1184:M6.5	The proponent shall implement the latest revision of the offset strategy approved by the CEO.	<ul style="list-style-type: none"> Written correspondence 	<ul style="list-style-type: none"> Record of CEO approval of a new revision of the Offset Strategy if relevant. 	Overall	Ongoing	Noted– no current actions required	Not Applicable until Offset Strategy approved by CEO.
1184:M6.6	The proponent shall continue to implement the offset strategy until the CEO has confirmed by notice in writing that the proponent has demonstrated that the objective in condition 6-1 has been met.	<ul style="list-style-type: none"> Implement approved Offset Strategy Compliance assessment 	<ul style="list-style-type: none"> Offset Strategy Compliance Assessment Report 	Overall	Ongoing - Until the CEO has confirmed that the proponent has demonstrated that the objective in condition 6-1 has been met.	Noted– no current actions required	N/A
1184:M6.7	Should the actions, objectives, or targets in the offset strategy be unable to be met, the proponent shall notify the CEO within thirty (30) days of it being identified and provide details and timing of contingency actions to be undertaken, to the satisfaction of the CEO.	<ul style="list-style-type: none"> Implement Offset Strategy Compliance assessment Written correspondence 	<ul style="list-style-type: none"> Offset Strategy Compliance Assessment Report Copy of letter/email and report to the CEO providing results of 	Overall	Within 30 days of the actions, objectives, or targets in the offset strategy	Noted– no current actions required	N/A

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			the investigation into the non-achievement and any additional proposed management measures		not being able to be met.		
1184:M6.8	The proponent shall report to the CEO on the outcomes of the contingency actions as required by the condition 6-7 within sixty (60) days of completion.	<ul style="list-style-type: none"> Monitoring and assessment of contingency action outcomes Written correspondence 	<ul style="list-style-type: none"> Report on contingency action outcomes Copy of letter/email to the CEO providing the outcomes of contingency actions 	Overall	Within 60 days of completion of contingency actions.	Noted– no current actions required	N/A
Contact Details							
1184:M7.1	The proponent shall notify the CEO of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.	<ul style="list-style-type: none"> Written correspondence if relevant 	<ul style="list-style-type: none"> Copy of letter/email to CEO advising of change in name, physical address, or postal address, if any of these have occurred. 	Overall	Within 28 days of a change in name, physical address or postal address.	Compliant	Letter WNG-LT-353 from APA dated 14 th April 2022, notified EPA (DWER) of change in Perth office address week ending 18 th March 2022.
Time Limit for Proposal Implementation							
1184:M8.1	The proponent shall not commence implementation of the proposal after five (5) years from the date of this Statement, and any commencement, prior to this date, must be substantial.	<ul style="list-style-type: none"> Written correspondence Contractor records Photographs of substantial commencement of the proposal 	<ul style="list-style-type: none"> Copy of letter/email to CEO advising of substantial commencement of the project, including records and photographs 	Overall	Closed - By 2 February 2027.	Compliant	Correspondence from APA to EPA (DWER) dated 31 st March 2002 advised EPA of planned construction commencement at the compressor station, pending Cultural Heritage Management Plan approval.
1184:M8.2	By the date that is five (5) years from the date of this Statement, the proponent shall notify the CEO in writing of the date of substantial commencement of the proposal, together with reasons why that date has been selected.						
Compliance Reporting							
1184:M9.1	The proponent shall prepare, and maintain a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 9-6, or prior to implementation of the proposal, whichever is sooner.	<ul style="list-style-type: none"> Prepare and submit a Compliance Assessment Plan Written correspondence 	<ul style="list-style-type: none"> Compliance Assessment Plan Record of submission of Compliance Assessment Plan 	Overall	Closed - Submit plan by 2 November 2022 or prior to construction.	Compliant	DWER advised CAP requirements met 11 th May 2022.
1184:M9.2	The Compliance Assessment Plan shall indicate: (1) the frequency of compliance reporting; (2) the approach and timing of compliance assessments; (3) the retention of compliance assessments; (4) the method of reporting of potential non-compliances and corrective actions taken; (5) the table of contents of Compliance Assessment Reports; and (6) public availability of Compliance Assessment Reports.	<ul style="list-style-type: none"> Prepare a Compliance Assessment Plan that includes: <ul style="list-style-type: none"> Frequency, Approach and timing, Retention of compliance assessments, Reporting of potential non-compliance, Corrective actions, Table of contents, and Public availability of Compliance Assessment Reports. 	<ul style="list-style-type: none"> Compliance Assessment Plan 	Overall	Closed - Submit plan by 2 November 2022 or prior to construction.	Compliant	DWER advised CAP requirements met 11 th May 2022.
1184:M9.3	After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the	<ul style="list-style-type: none"> Written correspondence 	<ul style="list-style-type: none"> Copy of letter from the CEO advising that the Compliance 	Overall	Ongoing	Compliant	DWER advised CAP requirements met 11 th

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Audit Code	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
	requirements of condition 9-2 the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 9-1.	<ul style="list-style-type: none"> Compliance Assessment 	<ul style="list-style-type: none"> Assessment Plan satisfies the requirements of condition 9-1 Compliance Assessment Report 				May 2022.
1184:M9.4	The proponent shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by condition 9-1 and shall make those reports available when requested by the CEO.	<ul style="list-style-type: none"> Compliance Assessment Written correspondence 	<ul style="list-style-type: none"> Compliance Assessment Report Copy of letter from the CEO requesting compliance assessment records where this has occurred Copy of letter/email providing compliance assessment records to the CEO where relevant. 	Overall	Ongoing	Compliant	Noted.
1184:M9.5	The proponent shall advise the CEO of any potential non-compliance within seven (7) days of that non-compliance being known.	<ul style="list-style-type: none"> Compliance Assessment records Written correspondence 	<ul style="list-style-type: none"> Compliance Assessment Report Copy of letter/email to the CEO providing compliance assessment records where relevant 	Overall	Ongoing - Within 7 days of a non-compliance being known.	Non - Compliant	As detailed in Table 1, non-achievements with this requirement have been identified and reported upon identification.
1184:M9.6	<p>The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO.</p> <p>The Compliance Assessment Report shall:</p> <p>(1) be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf;</p> <p>(2) include a statement as to whether the proponent has complied with the conditions;</p> <p>(3) identify all potential non-compliances and describe corrective and preventative actions taken;</p> <p>(4) be made publicly available in accordance with the approved Compliance Assessment Plan; and</p> <p>(5) indicate any proposed changes to the Compliance Assessment Plan required by condition 9-1.</p>	<ul style="list-style-type: none"> Prepare and submit Compliance Assessment Report Compliance Assessment Report includes: <ul style="list-style-type: none"> Appropriate endorsement, Statement of compliance, All potential non-compliances, Corrective and preventative actions taken, and Any changes proposed to the Compliance Assessment Plan. Public availability of Compliance Assessment Report Written correspondence 	<ul style="list-style-type: none"> Compliance Assessment Report Compliance Assessment Report publicly available on APA website, through website of relevant government agency, or upon request. Record of submission of Compliance Assessment Report 	Overall	Ongoing - Submit first report by 2 May 2023 and annually thereafter.	Compliant	This CAR has been submitted to meet this requirement.
Public Availability of Data							
1184:M10.1	Subject to condition 10-2, within a reasonable time period approved by the CEO of the issue of this Statement and for the remainder of the life of the proposal, the proponent shall make publicly available, in a manner approved by the CEO, all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps)), management plans and reports relevant to the assessment of this proposal and implementation of this Statement.	<ul style="list-style-type: none"> Any environmental data, management plans, and reports relevant to the assessment of this proposal and implementation of MS1184 will be publicly available according to the following: <ul style="list-style-type: none"> Where items are finalised and have received required external approvals, they will be publicly available on the APA website, through website of relevant government agency, or will be provided upon stakeholder request within seven days of APA receiving 	<ul style="list-style-type: none"> Public availability of information relevant to the assessment of this proposal and implementation of MS1184 shown through: <ul style="list-style-type: none"> APA website content, Data available on website of relevant government agency, or Records of requests for information and responses from APA. 	Overall	Ongoing - Within a reasonable time period approved by the CEO.	Compliant	https://www.apa.com.au/about-apa/our-projects/northern-goldfields-interconnect/ https://www.epa.wa.gov.au/proposals/northern-goldfields-interconnect-pipeline

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Audit Code	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>the request for information.</p> <ul style="list-style-type: none"> Where stakeholder requests are made for items that have not been finalised or have not received required external approvals, they will be provided within seven days of their finalisation or receipt of relevant external approval 					
1184:M10.2	<p>If any data referred to in condition 10-1 contains particulars of:</p> <p>(1) a secret formula or process; or</p> <p>(2) confidential commercially sensitive information, the proponent may submit a request for approval from the CEO to not make these data publicly available. In making such a request the proponent shall provide the CEO with an explanation and reasons why the data should not be made publicly available.</p>	<ul style="list-style-type: none"> Written correspondence where relevant 	<ul style="list-style-type: none"> Where data referred to in condition 10-1 of MS1184 is not made publically available: <ul style="list-style-type: none"> Copy of letter/email to CEO requesting approval to not make data publicly available Copy of response letter from CEO approving request 	Overall	Noted	Non - Compliant	As detailed in Table 1, a non-achievement with this requirement has been identified and reported upon identification.

9. References

Post Assessment Guideline for Preparing a Compliance Assessment Report, Post Assessment Guideline No. 3, Office of the Environmental Protection Authority, August 2012.

Post Assessment Guideline for Preparing an Audit Table, Post Assessment Guideline No. 1, Office of the Environmental Protection Authority, August 2012.

Post Assessment Form 2 - Statement of Compliance, Office of the Environmental Protection Authority, 2018.