

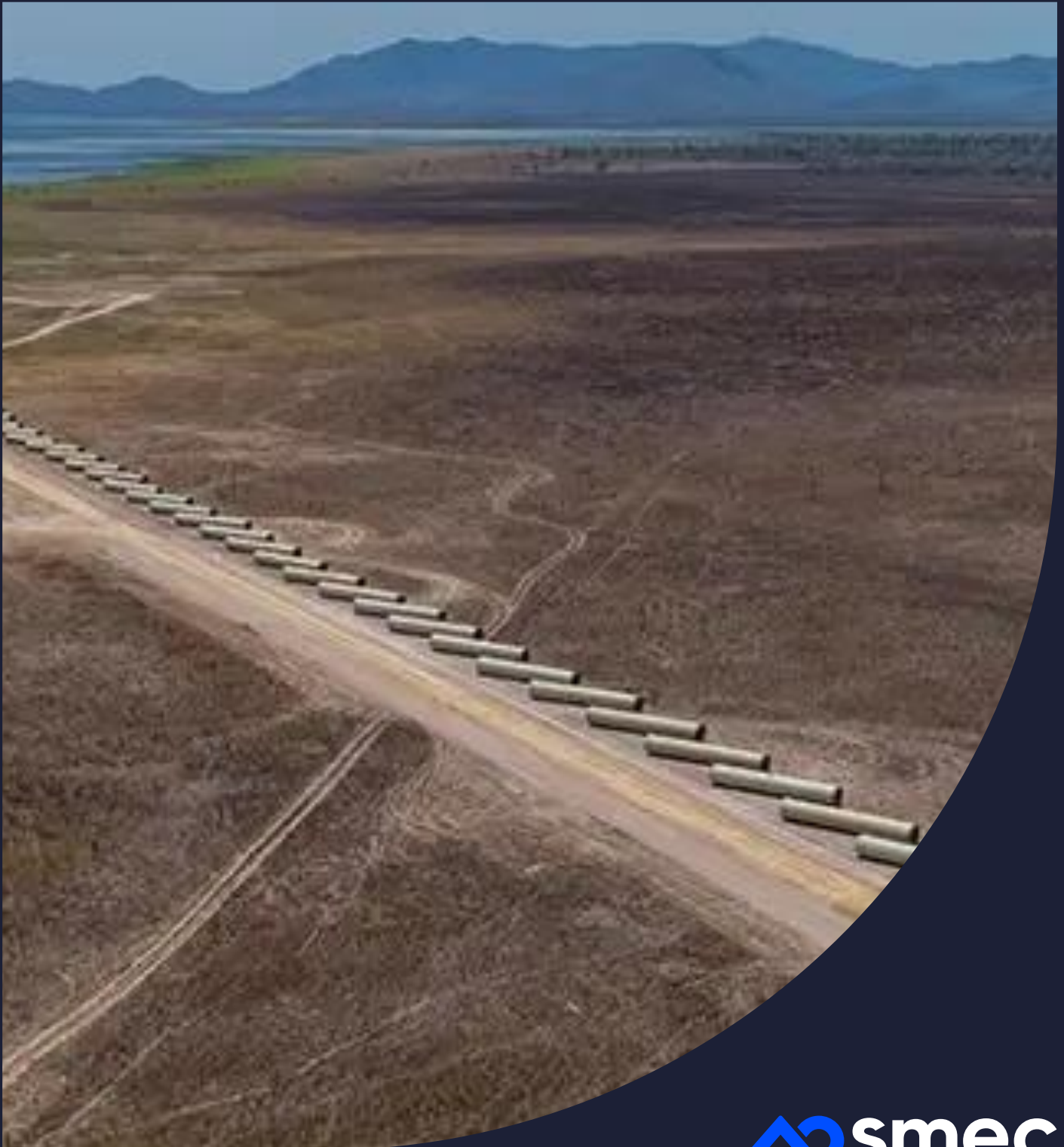
EPBC Act Approval Annual Compliance Report – Year 3

# Haughton Pipeline Stage 2

Prepared for: Townsville City Council

22 May 2026

Client Reference No. 30034291





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

**Signed:** *Blair Middleton*

**Full name:** Blair Middleton

**Position:** Project Director, Infrastructure & Operations, Capital Delivery

**Organisation:** Townsville City Council (ABN: 44 741 992 072)

**Date:** 22 May 2025

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# 1. Executive Summary

## 1.1 General

SMEC was engaged by Townsville City Council (TCC) to prepare the Year 3 (2026) Annual Compliance Report for the Houghton Pipeline Stage 2 Project (HPS2 or the Project). The Project is located approximately 60 kilometres south- east of Townsville. The reporting period for the Year 3 Annual Compliance Report is 23 February 2025 to 23 February 2026.

Approval under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) for the Project (EPBC 2021/9133) was obtained on 23 February 2023, for the following approved action:

*‘To construct and operate a buried pressure pipeline, approximately 28.5 km long, and associated infrastructure to provide transfer of about 364ML/day of raw water from Burdekin River to the Ross River Dam in Townsville, Queensland.’*

## 1.2 Purpose of report

This compliance report has been prepared to satisfy the requirements of Condition 27 of EPBC Approval 2021/9133 and has been prepared in line with the *‘Annual Compliance Report Guidelines, Commonwealth of Australia 2014.’*

The date of the original EPBC Act approval was 23 February 2023, with a varied approval issued on 12 March 2025. The Year 1 and Year 2 Annual Compliance Reports assessed compliance over successive 12-month periods commencing from the original approval date (23 February). Consistent with this established approach, the Year 3 Annual Compliance Report assesses compliance over the equivalent 12-month period aligned to the original approval date (23 February 2025 to 23 February 2026), rather than resetting reporting timeframes to the date of the varied approval.

The key dates that relate to EPBC Approval 2021/9133 are detailed in Table 1 below.

Table 1: Key Actions and Dates of EPBC Act Approval (2021/9133)

Action	Key Date
EPBC Act Approval	23 February 2023
Commencement of Action	14 August 2023
Commenced implementation of Offset Area Management Plan	17 July 2023
Commence implementation of Rehabilitation Management Plan	Within 20 business days of substantial completion of construction
Variation of EPBC Act Approval Conditions	12 March 2025
Expiry of Commonwealth Approval	31 December 2051

This report will be published on the TCC website as per the timeframe set in condition 30a of the EPBC Approval, and provided to the Department of Climate Change, Energy, the Environment and Water (DCCEEW or the Department) in line with Condition 30b and 30c.

## 2. Description of activities

### 2.1 Project background

The Project comprises the construction of a new pump station at the Burdekin River Clare Weir Storage south of Townsville, a 1.8m diameter pipeline approximately 28.5km in length connecting Clare Weir to the Stage 1.1 connection point and, ancillary disturbance locations for construction of the pipeline (laydowns, access roads, stockpile sites). Powerlink have carriage of the high voltage substation and overhead powerline connecting the substation to the pump station; however, this disturbance is included with the EPBC approved Action. Construction is expected to take 2.5 to 3 years, and operational maintenance and access has been accounted for in the impact.

The proposed action, along with the previously constructed Stage 1 and Stage 1.1, are collectively known as Haughton Pipeline Duplication Project (HPDP). The HPDP includes the following stages:

- Stage 1 of the Project was completed in 2020 and comprises approximately 33 km of DN1800 pipeline constructed from the Haughton River to Toonpan Creek at the head of Ross River Dam.
- Stage 1.1 of the Project was completed in 2021 and is an extension of the Stage 1 pipeline works by 4 km from the Haughton River, directed towards the Stage 2 pipeline alignment. The Stage 1.1 works terminate at an isolation valve pit and is the connection point for Stage 2.
- **Stage 2 (this Project)** comprises construction of new pump station and construction of a new 28.5 km water pipeline from the pump station to Stage 1.1 to provide an integrated water transfer system and associated ancillary works. Construction for the pipeline was due to begin in April 2023, with completion of the construction phase by the July 2025 however this timeline has changed due to a delayed start to construction being in August 2023.

The Project was designated as a controlled action, pursuant to the EPBC Act on the 18 February 2022 (EPBC 2021/9002). A variation to the EPBC Act Approval conditions was sought with the amended decision notice provided on 12 March 2025.

### 2.2 Activities during reporting period

Project activities that occurred during the reporting period (23 February 2025 to 23 February 2026) are detailed below:

- No further vegetation clearing has occurred within the pipeline construction corridor limits.
- Completed vegetation clearing (excluding water pump station, high voltage substation and powerline easement).
- Continued implementation of Offset Area Management Plan activities.
- Underground pipeline over 70% completed.

High voltage substation, powerline easement and water pump station have not been cleared and constructed.

The North Queensland wet season occurring within this 12-month reporting period resulted in higher-than-average rainfall for the months of February and March 2026. Due to the low-lying nature of the HPS2 project site and the accumulated rainfall in 2026, the construction program has been delayed as many areas along the construction corridor were inaccessible due to flooding from February to March 2026. In addition, the project area also received above average rainfall in April 2025, which also caused further time delays to the project.

### 3. Compliance assessment

#### 3.1 EPBC Act Approval (EPBC 2021/9002)

An assessment of compliance against EPBC Act Approval (EPBC 2021/9002) for the reporting period between 23 February 2025 and 23 February 2026, is provided below.

In accordance with the ‘Annual Compliance Report Guidelines, Commonwealth of Australia 2014’, the compliance assessment presents a compliance status finding against each condition as ‘compliant’, ‘non-compliant’ or ‘not applicable’. Comments are provided against conditions where required.

Information regarding Year 1 and Year 2 findings is derived from the Year 1 Annual Compliance Report (Kleinfelder 2024) and Year 2 Annual Compliance Report (Kleinfelder 2025).

Table 2: Compliance Assessment against EPBC Approval Conditions

No.	Condition	Condition triggered in Year 3?	Date due	Compliance Assessment	Findings
<b>Maximum clearance limits</b>					
1	The approval holder must not clear outside the project area.	Yes	Whole of project	<b>Compliant</b>	<p><b>Year 1:</b> Non-compliant. Minor change variation requested in September 2024, yet to be approved by DCCEE.</p> <p><b>Year 2:</b> Non-compliant. Minor change variation requested in September 2024, yet to be approved by DCCEE.</p> <p><b>Year 3:</b> Compliant. No clearing occurred between 23 February 2025 and 23 February 2026.</p>
2	The approval holder must not clear more than the following:	Yes	Whole of project	<b>Compliant</b>	<p><b>Year 1:</b> Compliant. 68.23 ha cleared.</p> <p><b>Year 2:</b> Compliant. 9.68 ha cleared (subtotal 77.91 ha).</p> <p><b>Year 3:</b> Compliant. No clearing occurred between 23 February 2025 and 23 February 2026.</p>
	a. 96.34 ha of Southern Black-throated Finch habitat.	Yes	Whole of project	<b>Compliant</b>	<p><b>Year 1:</b> Compliant. 89.73 ha cleared.</p> <p><b>Year 2:</b> Compliant. 21.40 ha cleared (subtotal 111.13 ha).</p> <p><b>Year 3:</b> Compliant. No clearing occurred between 23 February 2025 and 23 February 2026.</p>
	b. 134.2 ha of Koala habitat.	Yes	Whole of project	<b>Compliant</b>	<p><b>Year 1:</b> Compliant. 62.82 ha cleared.</p> <ul style="list-style-type: none"> <li>24.88 ha Roosting habitat.</li> </ul>
	c. 92.23 ha of Bare-rumped Sheathtail Bat habitat, comprising no more than:	Yes	Whole of project	<b>Compliant</b>	

Compliance assessment

No.	Condition	Condition triggered in Year 3?	Date due	Compliance Assessment	Findings
	<ul style="list-style-type: none"> <li>i. 43.12 ha of Bare-rumped Sheathtail Bat roosting habitat.</li> <li>ii. 85.54 ha of Bare-rumped Sheathtail Bat foraging habitat.</li> </ul>				<ul style="list-style-type: none"> <li>• 37.27 ha Foraging habitat.</li> </ul> <p><b>Year 2:</b> Compliant. 11.13 ha cleared (subtotal 73.95 ha).</p> <ul style="list-style-type: none"> <li>• 8.12 ha Roosting habitat.</li> <li>• 3.01 ha Foraging habitat.</li> </ul> <p><b>Year 3:</b> Compliant. No clearing occurred between 23 February 2025 and 23 February 2026.</p>
<b>Rehabilitation requirements</b>					
3	Within 10 business days of the substantial completion of construction, the approval holder must notify the department in writing that construction is completed.	No	TBC	Not applicable	Construction is ongoing.
4	Within 20 business days of the substantial completion of construction, the approval holder must commence implementing the Rehabilitation Management Plan.	No	TBC	Not applicable	Construction is ongoing.
5	Within 60 business days following the 1-year anniversary of the date of commencing implementation of the Rehabilitation Management Plan, the approval holder must submit a report to the department which provides evidence that rehabilitation areas have achieved the acceptance criteria.	No	TBC	Not applicable	Construction is ongoing.
6	Once acceptance criteria are achieved, the approval holder must ensure acceptance criteria are maintained in all rehabilitation areas for at least 12 months following the date on which the report is submitted to the department in accordance with condition 5.	No	TBC	Not applicable	Construction is ongoing.
<b>Environmental Offset Requirements</b>					
7	To compensate for residual significant impacts to protected matters, up to the limits specified in condition 2, the approval holder must commence implementing the Offset Area Management Plan (OAMP) prior to the commencement of the action and continue to implement it for the remainder of the life of the approval. The approval holder must:	No	14/08/2023	<b>Compliant CONDITION MET</b>	<p><b>Year 1:</b> Compliant. Implementation of the Offset Area Management Plan (OAMP) was 17 July 2023, with notification via an email to the Department from Townsville City Council on the 26 July 2023 (Kleinfelder 2024).</p> <p><b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b></p>

Compliance assessment

No.	Condition	Condition triggered in Year 3?	Date due	Compliance Assessment	Findings
	a. The approval holder must notify the department in writing of the date of commencing OAMP implementation within 20 business days of the date of commencing OAMP implementation.	No	3/09/2023	<b>Compliant CONDITION MET</b>	<b>Year 1:</b> Compliant. Implementation of the Offset Area Management Plan (OAMP) was 17 July 2023, with notification via an email to the Department from Townsville City Council on the 26 July 2023 (Kleinfelder 2024). <b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b>
	b. The approval holder must develop a Weed Management Plan (WMP), that meets the requirements set in the OAMP, commence implementing the WMP by the date this approval is signed and continue to implement the WMP at least until expiry of this approval.	Yes	12/03/2025	<b>Compliant</b>	<b>Year 1:</b> N/A <b>Year 2:</b> N/A <b>Year 3:</b> The WMP was finalised on 2 October 2024, and implementation of the WMP commenced in August 2023, with mechanical clearing of woody weeds. <b>Details about ongoing implementation of the plan are supplied in Section 3.2, compliance with the Offset Area Management Plan (OAMP), and in the WMP Annual Report.</b> <a href="https://www.townsville.qld.gov.au/_data/assets/pdf_file/0033/249882/EPBC-2021-9133_Offset-Area-Weed-Management-Plan_V2-reduced.pdf">https://www.townsville.qld.gov.au/_data/assets/pdf_file/0033/249882/EPBC-2021-9133_Offset-Area-Weed-Management-Plan_V2-reduced.pdf</a>
	c. The approval holder must develop a Monitoring and Maintenance Schedule (MMS) for revegetation and regeneration, that meets the requirements set out in the OAMP, by the date this approval is signed. Commence implementation of the MMS from 1 May 2025 and continue to implement the MMS at least until the expiry of this approval.	Yes	1/05/2025	<b>Compliant (submission delayed)</b>	<b>Year 1:</b> N/A <b>Year 2:</b> N/A <b>Year 3:</b> The MMS is contained within Section 3.1.3 and Section 4 of the Offset Area Revegetation and Rehabilitation Plan (OARR). The OARR was finalised on 2 December 2024. Implementation of the MMS/OARR commenced on 15 June 2025. Implementation was delayed due to extreme rainfall events that prevented vehicular access to the site. <b>Details about ongoing implementation of the plan are supplied in Section 3.2, compliance with the Offset Area Management Plan (OAMP), and in the OARR Annual Report.</b> <a href="https://www.townsville.qld.gov.au/_data/assets/pdf_file/0019/256204/EPBC-2021-9133-Offset-Area-Revegetation-and-Rehabilitation-Management-Plan_Final.pdf">https://www.townsville.qld.gov.au/_data/assets/pdf_file/0019/256204/EPBC-2021-9133-Offset-Area-Revegetation-and-Rehabilitation-Management-Plan_Final.pdf</a>
	d. The approval holder must complete installation of a permanent water source in the offset area, as specified in the OAMP, by 30 June 2025.	Yes	30/06/2025	<b>Compliant (submission delayed)</b>	On 11 November 2025 and 13 November 2025, TCC provided correspondence to the DCCEEW regarding the water source indicating that the permanent water source has been 95% completed and the following components need to be installed:

No.	Condition	Condition triggered in Year 3?	Date due	Compliance Assessment	Findings
				<b>CONDITION MET</b>	<p>1. A submersible pump (to be installed within the bore itself);</p> <p>2. A solar panel and stand (to power the submersible pump); and</p> <p>3. A reverse osmosis system (to treat the bore water for any salinity issues).</p> <p>See Plates 1-4 for images of the installed water source.</p> <p>To initiate operation of the water point source, water tanks have been filled with potable water and are fully operational.</p> <p>Presently, both water tanks in the attached photos have been filled with potable water and are fully operational.</p> <p>A float valve is in operation within the smaller tank so when the water drops to a certain level within the smaller tank, the valve will open and water from the larger tank will then fill the smaller tank, thus providing a continued supply of drinking water for the Black Throated Finch.</p> <p>There is approximately 5 to 6 months' worth of water in the large tank before it will require filling again (if required Council can refill the tank via a water truck).</p> <p>With the water point now in operation, Townsville City Council believes that the water source has now been completed, thus complying with Condition 7D (Refer to Attached Emails to DCCEEW).</p> <p><b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b></p>
	a. The approval holder must develop a Bushfire Management Plan (BMP), that meets the requirements set out in the OAMP. Commence implementing the BMP by 1 July 2025 and continue to implement the BMP at least until the expiry of this approval.	Yes	1/07/2025	<b>Compliant</b>	<p>A Bushfire Management Plan (BMP) was finalised on 24 September 2024.</p> <p>Implementation of the plan commenced on 22 June 2025 with a controlled burn completed by contractor Fireland.</p> <p><b>Details about ongoing implementation of the plan are supplied in Section 3.2, compliance with the Offset Area Management Plan (OAMP), and in the BMP Annual Report.</b></p> <p><a href="https://www.townsville.qld.gov.au/_data/assets/pdf_file/0025/248713/EPBC2021_9133_Offset-Area_BMP.pdf">https://www.townsville.qld.gov.au/_data/assets/pdf_file/0025/248713/EPBC2021_9133_Offset-Area_BMP.pdf</a></p>

No.	Condition	Condition triggered in Year 3?	Date due	Compliance Assessment	Findings
	b. The approval holder must conduct baseline pest monitoring in accordance with relevant guidelines to identify the presence and prevalence of feral pests in the offset area and develop, by the date this approval is signed, a Feral Animal Management Program (FAMP), that meets the requirements set out in the OAMP. Commence implementing the FAMP from the date this approval is signed and continue to implement the FAMP at least until the expiry of this approval.	Yes	12/03/2025	Compliant	<p>A Feral Animal Management Program was finalised on 29 August 2024. The document is called the Offset Area Pest Animal Management Plan (PAMP).</p> <p>Implementation of the plan commenced on 20 October 2024 with the first pest shoot.</p> <p><b>Details about ongoing implementation of the plan are supplied in Section 3.2, compliance with the Offset Area Management Plan (OAMP), and in the PAMP Annual Report.</b></p> <p><a href="https://www.townsville.qld.gov.au/_data/assets/pdf_file/0026/248714/EPBC-2021-9133_Offset-Area-Pest-Animal-Management-Plan.pdf">https://www.townsville.qld.gov.au/_data/assets/pdf_file/0026/248714/EPBC-2021-9133_Offset-Area-Pest-Animal-Management-Plan.pdf</a></p>
	c. The approval holder must submit to the department accurate and complete documentation and monitoring data to demonstrate compliance with conditions 7B, 7C, 7D, 7E and 7F in the next compliance report required under conditions 27 to 30 inclusive of this approval.	Yes	23/05/2026	Compliant	<p>Documentation is supplied as follows:</p> <ul style="list-style-type: none"> <li>Condition 7B: A link to the published WMP is supplied above. Details of implementation are supplied in the WMP Annual Report.</li> <li>Condition 7C: A link to the published MMS/OARR is supplied above. Details of implementation are supplied in the OARR Annual Report.</li> <li>Condition 7D: See Plates 1-4 for images of the installed water source.</li> <li>Condition 7E: A link to the published BMP is supplied above. Details of implementation are supplied in the BMP Annual Report.</li> <li>Condition 7F: A link to the published FAMP (PAMP) is supplied above. Details of implementation are supplied in the PAMP Annual Report.</li> <li>Monitoring data for each of the above plans is supplied as an Excel spreadsheet, spatial data and other forms.</li> </ul>
8	If the Southern Black-throated Finch has not been detected within the offset area within three years of the date of commencing OAMP implementation, the approval holder must provide to the department, within 20 business days of the three-year anniversary of the date of commencing OAMP implementation, a report that includes:	Yes	3/09/2026	Compliant CONDITION MET	<p>Southern Black-throated Finch was recorded within the Offset Site on 29/04/2024. On 16/10/25 DCCEEW supplied email correspondence confirming that the evidence supplied is satisfactory:</p> <p><i>The Department has reviewed Mr Jason Mark's statutory declaration and is satisfied that the black throated finish (BTF) was seen within the Haughton Pipeline Stage 2 Offset Area. This</i></p>

Compliance assessment

No.	Condition	Condition triggered in Year 3?	Date due	Compliance Assessment	Findings
	<ul style="list-style-type: none"> <li>a. A detailed description of the survey method, timing and effort undertaken to detect the Southern Black-throated Finch in the offset area;</li> <li>b. An assessment of the likelihood of the Southern Black-throated Finch being present in the offset area, including an analysis of the likely cause(s) for the failure to detect Southern Black-throated Finch in the offset area; and</li> <li>c. The additional actions the approval holder proposes to undertake to increase the likelihood of detecting Southern Black-throated Finch in the offset area.</li> </ul>				<p><i>fulfills the requirements of Condition 8 of EPBC approval 2021/9133. I have updated the Department's record management system to reflect this.</i></p> <p><b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b></p>
9	<p>Within 60 business days following each 5-year anniversary of the date of commencing OAMP implementation, until the expiry of this approval, the approval holder must submit to the department and publish on the website for the remainder of the period of the approval, an OAMP Report which assesses progress towards achieving and maintaining each of the completion criteria. If the Southern Black-throated Finch has not been detected within the offset area within five years of the date of commencing OAMP implementation the approval holder must inform the department of this in writing before or when submitting the OAMP Report and note the requirements of conditions 8 and 10. The report must:</p> <ul style="list-style-type: none"> <li>a. detail performance achieved against all interim performance targets in the period since this approval decision with more detail in respect of the period since the previous (if any) OAMP Report;</li> <li>b. describe the results and effectiveness of all management actions implemented during the period the subject of the current OAMP Report;</li> <li>c. include all monitoring results, including all confirmed sightings of protected matters in a format consistent with the Guidelines for biological survey and mapped data; and</li> </ul>	No	13/10/2028	Not applicable	N/A

Compliance assessment

No.	Condition	Condition triggered in Year 3?	Date due	Compliance Assessment	Findings
	<p>d. detail any interim performance targets not met and describe all corrective actions taken and evaluate their effectiveness.</p> <p>Once the completion criteria are achieved, the approval holder must ensure the completion criteria for the offset area are maintained for the remainder of the life of the approval.</p>				
10	If the Southern Black-throated Finch has not been detected within the offset area within five years of the date of commencing OAMP implementation and, after the receipt of the first OAMP Report, the Minister writes to the approval holder stating that he/she considers that the OAMP is not likely to achieve the confirmed presence of Southern Black-throated Finch within the offset area, the approval holder must, within 6 months of receiving the Minister's notice, submit to the department for the Minister's approval an Alternative OAMP. The Alternative OAMP must meet the requirements of the Environmental Offsets Policy and the Environmental Management Plan Guidelines to the satisfaction of the Minister.	No	13/10/2028	Not applicable	N/A
11	Within 60 business days following the 20-year anniversary of the date of commencing OAMP implementation, the approval holder must submit a report to the department which provides evidence that the entire offset area has fully achieved and maintained the completion criteria. If any completion criterion has not been achieved within 20 years from the date of the OAMP implementation, the approval holder must provide, within 6 months, additional environmental offsets approved by the Minister in writing consistent with the Environmental Offsets Policy.	No	13/10/2043	Not applicable	N/A
<b>Legal securing of environmental offsets</b>					
12	The approval holder must legally secure the offset area within 12 months from the date of the commencement of the action. The OAMP must be attached to the legal mechanism used to legally secure the offset area.	No	14/08/2024	<b>Compliant CONDITION MET</b>	The area was approved as a Declared Area by the Queensland Department of Resources on 10 May 2024. <b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b>

Compliance assessment

No.	Condition	Condition triggered in Year 3?	Date due	Compliance Assessment	Findings
13	The approval holder must provide written evidence to the department within 10 business days of the offset area being legally secured.	No	24/08/2024	<b>Compliant CONDITION MET</b>	Notification to the department for the approved Declared Area was provided via letter on 17 May 2024. <b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b>
14	The approval holder must ensure the offset area, once legally secured, continues to be legally secured for, at least, the remainder of the life of the approval.	No	31/12/2051	<b>Compliant CONDITION MET</b>	The Declared Area is noted on the property title and is binding for current and future owners. The Project is considered compliant based on the legal pathway undertaken for securing the offset area. <b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b>

**Revision of action management plans**

15	The approval holder may, at any time, apply to the Minister for a variation to plan approved by the Minister by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised plan then, from the date specified, the approval holder must implement the revised plan in place of the previous plan.	Yes	Whole of project	Not applicable	The plans associated with the EPBC Approval (2021/9133) have not been varied during the reporting period.
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**Submission and publication of plans**

16	Unless otherwise agreed to in writing by the Minister, the approval holder must publish each plan on the website within 15 business days of the date: <ol style="list-style-type: none"> <li>of this approval, if the version of the plan to be implemented is specified in these conditions; or</li> <li>the plan is approved by the Minister in writing, if the plan requires the approval of the Minister.</li> <li>by which the approval holder must develop a plan or 'schedule', if condition 7 specifies a date by which a plan or 'schedule' must be prepared</li> </ol>	Yes	16/07/2025	<b>Compliant</b>	All plans are published on the Townsville City Council website for the Haughton Pipeline: <a href="https://www.townsville.qld.gov.au/building-planning-and-projects/council-projects/major-projects/projects-environmental-approval-documents">https://www.townsville.qld.gov.au/building-planning-and-projects/council-projects/major-projects/projects-environmental-approval-documents</a> To date, all plans have been published within 15 days of the relevant timeframe.
17	The approval holder must keep all published plans required by these conditions on the website until, at least, the expiry date of this approval.	Yes	31/12/2051	<b>Compliant</b>	All plans are published on the Townsville City Council website for the Haughton Pipeline: <a href="https://www.townsville.qld.gov.au/building-planning-and-projects/council-projects/major-projects/projects-environmental-approval-documents">https://www.townsville.qld.gov.au/building-planning-and-projects/council-projects/major-projects/projects-environmental-approval-documents</a>

Compliance assessment

No.	Condition	Condition triggered in Year 3?	Date due	Compliance Assessment	Findings
18	The approval holder is required to exclude or redact sensitive ecological data from plans published on the website or otherwise provided to a member of the public.	Yes	Whole of project	Compliant	Plans published on the website (OAMP, OARR, WMP, PAMP, BMP, Annual Compliance Reports) do not contain sensitive ecological data.
19	If sensitive ecological data is excluded or redacted from a plan in accordance with condition 18, the approval holder must notify the department in writing what exclusions and redactions have been made in the version published on the website.	Yes	Whole of project	Compliant	No data was excluded or redacted from published reports.
<b>Notification of commencement of the action</b>					
20	The approval holder must notify the department electronically of the date of commencement of the Action, within 10 business days of commencement of the Action.	No	24/08/2023	Compliant CONDITION MET	The first Annual Compliance Report (Kleinfelder, 2024) documented compliance with this condition. The commencement of the Action occurred on 14 August 2023, with Townsville City Council notifying the department as evidenced by an email on 25 August 2023. <b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b>
21	If the commencement of the Action does not occur within 5 years from the date of this approval, then the approval holder must not commence the Action without the prior written agreement of the Minister.	No	14/08/2028	Compliant CONDITION MET	The first Annual Compliance Report (Kleinfelder, 2024) documented compliance with this condition. The date of this approval is 23 February 2023. The commencement of the Action occurred within the 5 years on 14 August 2023. <b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b>
<b>Compliance records</b>					
22	The approval holder must maintain accurate and complete compliance records.	Yes	Whole of project	Compliant	The approval holder has provided accurate and complete compliance records for this 12-month reporting period.
23	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request.	Yes	Whole of project	Compliant	No request from the Department has been made during the reporting period.
24	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the <i>Guidelines for biological survey and mapped data</i> ,	Yes	Whole of project	Compliant	All monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Guidelines for biological survey and mapped data, Commonwealth of Australia 2018.

No.	Condition	Condition triggered in Year 3?	Date due	Compliance Assessment	Findings
	<i>Commonwealth of Australia 2018</i> , or as otherwise specified by the Minister in writing.				
25	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the <i>Guide to providing maps and boundary data for EPBC Act projects, Commonwealth of Australia 2021</i> , or as otherwise specified by the Minister in writing.	Yes	Whole of project	Compliant	All monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Guide to providing maps and boundary data for EPBC Act projects, Commonwealth of Australia 2021.
26	The approval holder must submit all monitoring data (including sensitive ecological data), surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the department in accordance with the requirements of each plan.	Yes	Whole of project	Compliant	Monitoring data relevant to this reporting period for the OAMP, OARR, WMP, PAMP, BMP is supplied as an Excel spreadsheet and spatial data. Information specific to each of the OAMP, OARR, WMP, PAMP, BMP is supplied in their respective annual reports.
27	The approval holder must prepare a compliance report for each 12-month period from the date of this approval, or as otherwise agreed to in writing by the Minister.	Yes	23/05/2026	Compliant	<b>Year 1:</b> Compliant. <b>Year 2:</b> Compliant. <b>Year 3:</b> This compliance report is for the third 12-month period following the date of this approval, being 23 February 2025 to the 23 February 2026.
28	The approval holder must ensure that each compliance report is consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2014.	Yes	Whole of project	Compliant	This compliance report is prepared in accordance with the Annual Compliance Report Guidelines, Commonwealth of Australia 2014.
29	The approval holder must ensure that each compliance report includes: <ul style="list-style-type: none"> <li>a. Accurate and complete details of compliance and any non-compliance with the conditions and the plans, and any incidents.</li> </ul>	Yes	Whole of project	Compliant	Accurate and complete details of compliance and non-compliance with the conditions and associated plans, as well as incidents relating to any event which has the potential to, or does, impact on a protected matter, are contained within this compliance report.
	<ul style="list-style-type: none"> <li>b. One or more shapefile showing all clearing of any protected matters, and/or their habitat, undertaken within the 12-month period at the end of which that compliance report is prepared.</li> </ul>	Yes	Whole of project	Compliant	No clearing was undertaken during this reporting period.
	<ul style="list-style-type: none"> <li>c. Include all confirmed sightings, injuries, and mortalities of listed threatened species in a format</li> </ul>	Yes	Whole of project	Compliant	No clearing was undertaken during this reporting period.

No.	Condition	Condition triggered in Year 3?	Date due	Compliance Assessment	Findings
	consistent with the Guidelines for biological survey and mapped data				
	d. A schedule of all plans in existence in relation to these conditions and accurate and complete details of how each plan is being implemented.	Yes	Whole of project	Compliant	<p>Compliance assessment of the implementation of each of the management plans for the current reporting period is set out in the following sections:</p> <ul style="list-style-type: none"> <li>• <b>OAMP:</b> Compliance assessment provided in Section 3.2.</li> <li>• <b>WMP:</b> Implementation details provided in the OARR Annual Report.</li> <li>• <b>OARR:</b> Implementation details provided in the OARR Annual Report.</li> <li>• <b>BMP:</b> Implementation details provided in the OARR Annual Report.</li> <li>• <b>PAMP:</b> Implementation details provided in the OARR Annual Report.</li> </ul>
30	The approval holder must:	Yes	22/07/2025	Compliant	The Year 2 Annual Compliance Report was published on 20 May 2025. <a href="https://www.townsville.qld.gov.au/_data/assets/pdf_file/0023/274307/Signed-EPBC-Annual-Compliance-Report-No-2.pdf">https://www.townsville.qld.gov.au/_data/assets/pdf_file/0023/274307/Signed-EPBC-Annual-Compliance-Report-No-2.pdf</a>
	a. Publish each compliance report on the website within 60 business days following the end of the 12-month period for which that compliance report is required.				
	b. Notify the department electronically, within 5 business days of the date of publication that a compliance report has been published on the website.	Yes	27/07/2025	Compliant	The department was notified electronically that the Year 2 Annual Compliance Report (Kleinfelder, 2025) was published on the Townsville City Council Project website on 20 May 2025.
	c. Provide the weblink for the compliance report in the notification to the department.	Yes	27/07/2025	Compliant	The Department was notified of publication of the Year 2 Annual Compliance Report (Kleinfelder, 2025) with a weblink included.
	d. Keep all published compliance reports required by these conditions on the website until the expiry date of this approval.	Yes	Whole of project	Compliant	Annual Compliance Reports are available on the Townsville City Council website: <a href="https://www.townsville.qld.gov.au/building-planning-and-projects/council-projects/major-projects/projects-environmental-approval-documents">https://www.townsville.qld.gov.au/building-planning-and-projects/council-projects/major-projects/projects-environmental-approval-documents</a>
	e. Exclude or redact sensitive ecological data from compliance reports published on the website or otherwise provided to a member of the public.	Yes	Whole of project	Compliant	The Year 2 Annual Compliance Report (Kleinfelder, 2025) did not contain any sensitive ecological data.

No.	Condition	Condition triggered in Year 3?	Date due	Compliance Assessment	Findings
					This Year 3 compliance report does not contain any sensitive ecological data.
	f. If sensitive ecological data is excluded or redacted from the published version, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website.	Yes	Whole of project	<b>Compliant</b>	The Year 2 Annual Compliance Report (Kleinfelder, 2025) did not contain any sensitive ecological data. This Year 3 compliance report does not contain any sensitive ecological data.
<b>Reporting non-compliance</b>					
31	The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan.	Yes	Whole of project	<b>Compliant</b>	<p>Two matters of non-compliance were raised in the current reporting period:</p> <ul style="list-style-type: none"> <li>Condition 1: Non-compliance with clearing limits.</li> <li>Condition 7D: Delayed installation of the permanent water source in the offset area.</li> </ul> <p>The Department was notified within 2 business days of becoming aware of both incidents.</p> <p>One additional matter was raised by Townsville City Council with SMEC. Following a significant wet season event in 2025, sandy materials were deposited outside the approved construction corridor and project clearing boundary. The materials were consistent with both naturally occurring river sands and construction materials stockpiled within the construction corridor.</p> <p>An assessment of the incident by SMEC determined that naturally occurring river sand was deposited widely as a result of flooding both upstream and downstream of the project area, and that any sand associated with the construction site did not result in impacts noticeably greater than those caused by natural flood processes. The observed effects were therefore considered consistent with natural flooding rather than being caused by construction activities. As such, the incident was not deemed to be a matter of non-compliance and Townsville City Council made the decision not to notify the Department.</p>

No.	Condition	Condition triggered in Year 3?	Date due	Compliance Assessment	Findings
32	<p>The approval holder must specify in the notification:</p> <ul style="list-style-type: none"> <li>a. Any condition or commitment made in a plan which has been or may have been breached.</li> <li>b. A short description of the incident and/or potential non-compliance and/or actual non-compliance.</li> <li>c. The location (including co-ordinates), date, and time of the incident and/or potential non-compliance and/or actual non-compliance.</li> </ul> <p>Note: If the exact information cannot be provided, the approval holder must provide the best information available.</p>	Yes	Whole of project	Compliant	The required information was supplied to the Department with regard to both incidents.
33	<p>The approval holder must provide to the department in writing, within 12 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance, the details of that incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan. The approval holder must specify:</p> <ul style="list-style-type: none"> <li>a. Any corrective action or investigation which the approval holder has already taken</li> <li>b. The potential impacts of the incident and/or non-compliance</li> <li>c. The method and timing of any corrective action that will be undertaken by the approval holder.</li> </ul>	Yes	Whole of project	Compliant	<p>The Department was notified in writing within 12 business days of becoming aware of both incidents.</p> <p>The required information was supplied to the Department with regard to both incidents.</p>
<b>Independent audit</b>					
34	The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every five-year period following the commencement of the Action until this approval expires, unless otherwise specified in writing by the Minister.	No	14/08/2028	Not applicable	The first independent audit is not required until August 2028.
35	For each independent audit, the approval holder must: <ul style="list-style-type: none"> <li>a. Provide the name and qualifications of the nominated independent auditor, the draft audit criteria, and</li> </ul>	No	14/08/2028	Not applicable	The first independent audit is not required until August 2028.

Compliance assessment

No.	Condition	Condition triggered in Year 3?	Date due	Compliance Assessment	Findings
	<p>proposed timeframe for submitting the audit report to the department prior to commencing the independent audit.</p> <p>b. Only commence the independent audit once the nominated independent auditor, audit criteria and timeframe for submitting the audit report have been approved in writing by the department.</p> <p>c. Submit the audit report to the department for approval within the timeframe specified and approved in writing by the department.</p> <p>d. Publish each audit report on the website within 15 business days of the date of the department's approval of the audit report.</p>				
36	Each audit report must report for the five-year period preceding that audit report.	No	14/08/2028	Not applicable	The first independent audit is not required until August 2028.
37	Each audit report must be completed to the satisfaction of the Minister and be consistent with the Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines, Commonwealth of Australia 2019.	No	14/08/2028	Not applicable	The first independent audit is not required until August 2028.
<b>Completion of the action</b>					
38	The approval holder must notify the department electronically 60 business days prior to the expiry date of this approval, that the approval is due to expire.	No	TBC	Not applicable	Completion of the action has not occurred within this reporting period.
39	Within 20 business days after the completion of the Action, and, in any event, before this approval expires, the approval holder must notify the department electronically of the date of completion of the Action and provide completion data.	No	TBC	Not applicable	Completion of the action has not occurred within this reporting period.

**Plates 1- 4:** Evidence of permanent water source installation



## 3.2 Offset Area Management Plan (OAMP)

An assessment of compliance against Offset Area Management Plan (OAMP) requirements for the reporting period between 23 February 2025 and 23 February 2026, is provided below.

### IMPORTANT NOTE REGARDING TIMING:

The EPBC Act approval was granted on **23 February 2023** and includes the requirement to prepare an Annual Compliance Report from that date. The OARR, WMP, PAMP and BMP were subsequently established in **late 2024** and each includes annual reporting requirements from the respective plan’s commencement date.

This document is the Year 3 Annual Compliance Report for the EPBC Act approval, suggesting that the Year 3 performance indicators are relevant to this report. However, this is the first reporting period for the OARR, WMP, PAMP and BMP, which places each of those reports, and their relevant performance indicators, approximately at Year 1.

### 3.2.1 Management and mitigation measures

Management and mitigation measures for MNES are specified in Section 7.2 of the OAMP, and summarised below.

Table 3: OAMP Management Actions

No.	Requirement	Triggered in Year 3?	Date due	Compliance Assessment	Findings
1	Legally securing Offset Area	No	14/08/2024	<b>Compliant CONDITION MET</b>	This requirement aligns with <b>Condition 12 of EPBC Act Approval</b> . Refer to Table 1 for more information. <b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b>
2	Revegetation and regeneration management. Within 6 months of Project approval by DCCEEW, revegetation will commence within nominated areas.	Yes	1/05/2025	<b>Compliant (completion delayed) CONDITION MET</b>	This requirement aligns with <b>Condition 7C of EPBC Act Approval</b> . Refer to Table 1 for more information. If revegetation is defined as the start of the revegetation project - that is - at the time of preparing the site for revegetation, then these activities began in <b>August of 2023</b> with mechanical removal of Woody Weeds within a priority regeneration and revegetation area (non-remnant areas are designated as priority zones in the OAMP). All sites in the priority regeneration and revegetation zone needed to be cleared of woody weeds via mechanical control or other control prior to active planting. Then sufficient (minimum 1-year, best practice would be 3 years) of post clearing weed treatment on emergent seedlings from the underlying woody weed seed bank must occur. This allows the underlying native

No.	Requirement	Triggered in Year 3?	Date due	Compliance Assessment	Findings
					<p>seedbank a change to emerge, populating the site with local genetic stock, rather than relying on imported genetic material. This practice is aligned with best practice regeneration (details in the WMP Annual Report).</p> <p>If revegetation is defined as active seeding or planting, then revegetation occurred in <b>November and December 2025</b> in areas that had been cleared for 1-2 years.</p> <p><b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b></p>
3	Weed management. Weed management measures will be implemented within 6 months of Project approval by DCCEEW and an ongoing weed control program will commence.	Yes	12/03/2025	<b>Compliant (completion delayed)</b> <b>CONDITION MET</b>	<p>This requirement aligns with <b>Condition 7B of EPBC Act Approval</b>.</p> <p>The WMP was finalised on 2 October 2024, and implementation of the WMP commenced in August 2023, with mechanical clearing of woody weeds.</p> <p><b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b></p>
4	Water source management. Within 12 months of Project approval, permanent water sources will be installed at locations identified in Figure 7.1 in a manner that excludes livestock, macropods and limits predation by feral cats (water troughs mounted on extended legs above ground level)	Yes	30/06/2025	<b>Compliant (submission delayed)</b> <b>CONDITION MET</b>	<p>This requirement aligns with <b>Condition 7D of EPBC Act Approval</b>.</p> <p>On 11 November 2025 and 13 November 2025, TCC provided correspondence to the DCCEEW regarding the water source indicating that the permanent water source has been 95% completed and the following components need to be installed:</p> <ol style="list-style-type: none"> <li>1. A submersible pump (to be installed within the bore itself);</li> <li>2. A solar panel and stand (to power the submersible pump); and</li> <li>3. A reverse osmosis system (to treat the bore water for any salinity issues).</li> </ol> <p>To initiate operation of the water point source, water tanks have been filled with potable water and are fully operational.</p> <p>Presently, both water tanks in the attached photos have been filled with potable water and are fully operational.</p> <p>A float valve is in operation within the smaller tank so when the water drops to a certain level within the smaller tank, the valve will open and water from the larger tank will then fill the smaller tank, thus providing a continued supply of drinking water for the Black Throated Finch.</p> <p>There is approximately 5 to 6 months' worth of water in the large tank before it will require filling again (if required Council can refill the tank via a water truck).</p>

No.	Requirement	Triggered in Year 3?	Date due	Compliance Assessment	Findings
					With the water point now in operation, Townsville City Council believes that the water source has now been completed, thus complying with Condition 7D (Refer to Attached Emails to DCCEEW). <b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b>
5	Fire management. Within 12 months of Project approval, a Bushfire Management Plan will be developed and implemented.	Yes	1/07/2025	<b>Compliant CONDITION MET</b>	This requirement aligns with <b>Condition 7E of EPBC Act Approval</b> . A Bushfire Management Plan (BMP) was finalised on 24 September 2024. Implementation of the plan commenced on 22 June 2025 with a controlled burn completed by contractor Fireland. <b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b>
6	Control of feral animals. Baseline pest monitoring will be undertaken to identify evidence of feral or unwanted pests and development of a property wide feral animal management program specifying techniques (trapping, baiting, shooting) to be utilised will be completed within 12 months of commencement of the action. Key priorities will be monitoring and management of cats, rabbits, wild dogs and pigs.	Yes	12/03/2025	<b>Compliant CONDITION MET</b>	This requirement aligns with <b>Condition 7F of EPBC Act Approval</b> . A Feral Animal Management Program was finalised on 29 August 2024. The document is called the Offset Area Pest Animal Management Plan (PAMP). Implementation of the plan commenced on 20 October 2024 with the first pest shoot. <b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b>
7	Cattle densities will be reduced from the offset area and fencing will be secured where required to prevent cattle entering the offset area from adjoining properties.	Yes	31/12/25	<b>Compliant</b>	At the start of the offset period, cattle were continuously accessing the site through creek line fencing being washed away during the wet season. The offset area boundaries cross 3 creek lines with high flow and flood capacity during wet seasons. The cattle are mustered by the cattle owner annually. Efforts to improve cattle exclusion are underway with the improvement of boundary fencelines and creek line fences and creation of series of alleys and gates to reduce cattle impacts should they enter the system. This fencing was started in <b>October of 2025</b> and is ongoing as of this report. Additionally, Townsville City Council is undertaking a compliance process with the landholder to ensure continued timely removal of any cattle is upheld.
Tbl 7.4	Fire management guidelines for each of the REs that occur within the offset area are described in Table 7.4 of the OAMP.	Yes		<b>Compliant CONDITION MET</b>	The requirement to develop and implement a Bushfire Management Plan aligns with <b>Condition 7E of EPBC Act Approval</b> . A Bushfire Management Plan (BMP) was finalised on 24 September 2024. Implementation of the plan commenced on 22 June 2025 with a controlled burn completed by contractor Fireland. <b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b>

### 3.2.2 Monitoring commitments

Monitoring commitments are specified in Section 7.4 of the OAMP and summarised below.

Table 4: OAMP monitoring commitments (Table 7.7 of OAMP)

Monitoring aspect	Monitoring frequency	Method	Triggered ?	Compliance Assessment	Findings
<b>Baseline survey event</b>	The condition surveys that have been undertaken to inform preparation of this OAMP will form the baseline data.	N/A	No	<b>Compliant CONDITION MET</b>	Baseline surveys completed as part of OAMP development. <b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b>
<b>Revegetation</b>	<ul style="list-style-type: none"> <li>Weekly during the establishment phase (typically 12 weeks).</li> <li>Every 3 months for the first year after initial revegetation, then every six months in years 2 and 3 after initial treatment.</li> </ul>	<ul style="list-style-type: none"> <li>Assess plant health and mortality.</li> </ul>	Yes	<b>Partially Compliant</b>	<p>Revegetation occurred in November-December 2025. Monitoring was undertaken weekly for the first 5 weeks of revegetation establishment- prior to access being lost during the wet season. Further details in the OARR annual report.</p> <p>The 3 monthly monitoring requirement will be assessed in the Year 4 Annual Compliance Report.</p> <p><b>Corrective actions:</b></p> <p>Corrective actions include completion of planned access track upgrades, scheduled for completion in June 2026, to improve wet season access and reduce the risk of delayed monitoring.</p>
<b>Weed infestations</b>	<ul style="list-style-type: none"> <li>Every 3 months for the first year after initial treatment, then every six months in years 2 and 3 after initial treatment.</li> <li>Scheduled inspection and follow-up treatments once in years 4 and 5 after initial treatment.</li> </ul>	<ul style="list-style-type: none"> <li>Assess density and extent of weed infestations</li> </ul>	Yes	<b>Partially Compliant</b>	<p>Weed monitoring was undertaken in accordance with the WMP, using the monitoring methodology defined in the Baseline Weed Surveys as follows:</p> <ul style="list-style-type: none"> <li>December 2024-January 2025: Unable to access site during wet season.</li> <li>April-May 2025: Unable to access site during wet season.</li> <li>21 to 23 July 2025: Undertaken in accordance with WMP Baseline methodology by Townsville City Council.</li> </ul>

Compliance assessment

Monitoring aspect	Monitoring frequency	Method	Triggered ?	Compliance Assessment	Findings
					<ul style="list-style-type: none"> <li>20 to 23 October 2025: Undertaken in accordance with WMP Baseline methodology by Townsville City Council. Further details in the WMP annual report.</li> </ul> <p><b>Corrective actions:</b></p> <p>Corrective actions include completion of planned access track upgrades, scheduled for completion in June 2026, to improve wet season access and reduce the risk of delayed monitoring.</p>
<b>Habitat condition and Photographs</b>	<ul style="list-style-type: none"> <li>The condition plots will be assessed at Years 5, 10, 15 and 20 after the baseline survey.</li> <li>The timing of ongoing monitoring is to correspond to that of baseline surveys.</li> </ul>	<ul style="list-style-type: none"> <li>Condition monitoring will be undertaken at the plots assessed during baseline surveys.</li> <li>Assessment within these plots will be undertaken in accordance with Guide to Determining Terrestrial Habitat Quality (DES 2020).</li> <li>Locations and photographs of any disturbances or areas requiring maintenance or removal will be recorded as part of these surveys, including evidence of past fires, artificial water sources, access tracks, fences, dumped waste, internal external firebreaks, hazard fuel loads and erosion.</li> </ul>	No	Not applicable	N/A
<b>Feral animals</b>	<ul style="list-style-type: none"> <li>Years 1, 3 and 5 after baseline survey.</li> <li>Timing of ongoing monitoring to correspond to that of baseline surveys.</li> </ul>	<ul style="list-style-type: none"> <li>To be determined as part of developing the feral animal management program (e.g. ground-based camera trapping, spotlighting transects).</li> </ul>	Yes	<b>Compliant</b>	<p>Pest monitoring occurred 2/09/2025 to 15/10/2025, in accordance with Baseline Pest Monitoring methodology.</p> <p>Pest shoot occurred on 4th November and 11th November 2025.</p> <p>Further details in the WMP annual report.</p>

Monitoring aspect	Monitoring frequency	Method	Triggered ?	Compliance Assessment	Findings
<b>MNES fauna species*</b>	<ul style="list-style-type: none"> <li>Surveys of southern black-throated finch and bare-rumped sheathtail bat to determine species usage of the offset site</li> </ul>	<p>In accordance with the relevant survey guidelines (DEWHA 2009a,b; DSWEPaC 2011), including:</p> <ul style="list-style-type: none"> <li>Bare-rumped sheathtail bat: dusk roost watches, Anabat detector</li> </ul>	Yes	<b>Compliant CONDITION MET</b>	<p>Surveys for Bare-rumped Sheathtail Bat were completed on 29/04/2024. Bare-rumped Sheathtail Bat was potentially detected with an Anabat recording. However, the call cannot be differentiated from another species with similar call frequency. The appropriate methodology for bat surveys is currently under consideration.</p> <p>Surveys were not commissioned in 2025 due to the absence of a suitably qualified specialist capable of reliably identifying calls. <i>The OAMP does not include a requirement for Bare-rumped Sheathtail Bat surveys to be repeated or completed annually. Therefore, the survey above meets the requirements of this condition.</i></p> <p><b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b></p>
		<ul style="list-style-type: none"> <li>Southern black-throated finch: area searches around waterbodies for nests and birds; waterbody watches; vigilant bird surveys</li> </ul>	Yes	<b>Compliant CONDITION MET</b>	<p>Surveys for Southern Black-throated Finch (SBTF) were completed on 29/04/2024. Two Southern Black-throated Finch (SBTF) detected flying out of Offset Site and landing in tree approximately 2 meters (m) off the offset area boundary.</p> <p>A second round of SBTF surveys were conducted between May and October 2025, with additional JCU monitoring in November 2025. No SBTF were recorded. Peter Boise (BTF expert) suggests that the season was excessively wet, reducing availability of BTF food sources, resulting in local population crash.</p> <p>Details are supplied in the attached SBTF survey report. Acoustic survey results can be found in the document 'BTF SurveyRpt2025_L01'. The targeted search results can be found in the document 'BTF AcousticDetection2025_L01'.</p>

Compliance assessment

Monitoring aspect	Monitoring frequency	Method	Triggered ?	Compliance Assessment	Findings
					<p><i>The OAMP does not include a requirement for Southern Black-throated Finch surveys to be repeated or completed annually. Therefore, the survey above meets the requirements of this condition.</i></p> <p><b>CONDITION MET. NO FURTHER ACTION REQUIRED.</b></p>

\*Given that the presence of koala has not been confirmed at the impact site, no monitoring to determine koala presence at the offset site has been proposed, i.e. the offset aims to achieve a 'like for like' replacement as required under the offsets framework.

### 3.2.3 Performance Indicators and Completion Criteria

Performance Indicators and Completion Criteria are specified in Section 7.3 of the OAMP. An assessment of compliance against the relevant performance indicators is provided in Table 5. The complete table of completion criteria and corrective actions is provided in Table 6.

Habitat quality scores at completion and 5-yearly interim milestones are also specified in Section 7.3 of the OAMP, however an assessment of progress is not required until Year 5.

**IMPORTANT NOTE REGARDING TIMING:**

The EPBC Act approval was granted on **23 February 2023** and includes the requirement to prepare an Annual Compliance Report from that date. The OARR, WMP, PAMP and BMP were subsequently established in **late 2024** and each includes annual reporting requirements from the respective plan’s commencement date.

This document is the Year 3 Annual Compliance Report for the EPBC Act approval, suggesting that the Year 3 performance indicators are relevant to this report. However, this is the first reporting period for the OARR, WMP, PAMP and BMP, which places each of those reports, and their relevant performance indicators, approximately at Year 1.

Table 5: Assessment of Year 1 performance indicators

Ecological outcome	Year 1 (for the OARR, WMP, PAMP and BMP ) performance indicator	Indicator met?	Findings
Increase the area and quality of habitat for the relevant MNES species.	<ul style="list-style-type: none"> <li>At least 90 percent survival of planted tubestock is observed.</li> </ul>	<b>Not met</b>	<p>Tubestock survival did not meet the Year 1 performance indicator of at least 90% survival. Early survival varied across the 2025 revegetation trial areas. Factors affecting survival included remote site conditions, limited establishment watering opportunities, restricted wet season access, soil conditions, stock availability, and the onset of wet weather shortly after planting.</p> <p>The 2025 works were implemented as a targeted revegetation establishment trial to test practical survival, species suitability, soil preparation, soil conditioning, planting density, access constraints, maintenance requirements and scalable delivery costs under site conditions. The trial is consistent with the OAMP adaptive management framework, which provides for monitoring results to inform remedial actions and changes to the method or frequency of management actions where performance criteria are not met.</p> <p><b>Corrective actions:</b></p> <p>Corrective actions will include continued post-wet-season monitoring of planted areas, review of survival by species, treatment area and soil-conditioning method, and use of those results to inform future staged</p>

Ecological outcome	Year 1 (for the OARR, WMP, PAMP and BMP ) performance indicator	Indicator met?	Findings
			<p>revegetation, where relevant. Future works will consider revised timing, species selection, planting density, site preparation, establishment watering requirements, seeding support, weed control, fire outcomes and access logistics, while maintaining ecological outcomes and completion criteria.</p> <p>Access track upgrades are scheduled for completion in June 2026. These works are intended to improve wet season access and reduce the risk of delayed monitoring, maintenance and corrective action during future establishment periods.</p>
	<ul style="list-style-type: none"> <li>At least 70 percent germination of seeds is observed.</li> </ul>	<p><b>Not met</b></p>	<p>Seed germination did not meet the Year 1 performance indicator of at least 70% germination. Germination outcomes are expected to remain variable in field conditions. Germination rates were influenced by rainfall timing, soil moisture, seed-soil contact, seed pre-treatment type, seed predation, weed competition, inundation, and the timing of seeding relative to the wet season.</p> <p>Direct seeding and hydroseeding were included as complementary establishment methods to increase propagule availability, support native grass and woody species recruitment, and provide infill between tubestock plantings. The full hydroseeding scope was not completed due to the onset of wet weather and loss of site access, with only part of the planned treatment completed before access was lost.</p> <p><b>Corrective actions:</b></p> <p>Corrective actions will include post-wet-season monitoring of seeded areas, assessment of germination and recruitment by treatment type, and review of seed mix, provenance, pretreatment, application method, timing, mulch/soil preparation and follow-up weed control. Results will be used to inform future adaptive management, including whether seeding is best applied as a standalone methodology, infill treatment, or supportive methodology alongside weed control and fire-based native grass/forb recruitment.</p>
	<ul style="list-style-type: none"> <li>Natural regeneration of key flora species from all vegetation strata is observed in regrowth areas.</li> </ul>	<p><b>Met</b></p>	<p>Performance indicator met.</p> <p>See the OARR Annual Report for details.</p>
<p>Increase species richness of canopy and shrub level vegetation.</p>	<ul style="list-style-type: none"> <li>At least 90 percent survival of planted tubestock is recorded.</li> </ul>	<p><b>Not met</b></p>	<p>Tubestock performance did not meet the 90% survival target, with actual survival estimated at approximately 5–20%. See the OARR Annual Report for details.</p> <p>See the response above regarding tubestock viability.</p>

Ecological outcome	Year 1 (for the OARR, WMP, PAMP and BMP ) performance indicator	Indicator met?	Findings
Increase the cover and diversity of native grass species for southern black-throated finch.	<ul style="list-style-type: none"> <li>At least 70 percent germination of seeds is observed.</li> </ul>	<b>Not met</b>	<p>Seed germination did not meet the 70% target. See the OARR Annual Report for details.</p> <p>See the response above regarding seed germination viability.</p>
Reduce weed density	<ul style="list-style-type: none"> <li>Program for weed management has been developed and commenced to reduce the presence of weeds.</li> </ul>	<b>Met</b>	<p>Performance indicator met.</p> <p>This requirement aligns with <b>Condition 7B of EPBC Act Approval</b>.</p> <p>The WMP was finalised on 2 October 2024, and implementation of the WMP commenced in August 2023. For further details see the WMP Annual Report.</p>
Provide artificial permanent water sources	<ul style="list-style-type: none"> <li>Establish artificial permanent water source.</li> </ul>	<b>Met</b>	<p>Performance indicator met.</p> <p>This requirement aligns with <b>Condition 7D of EPBC Act Approval</b>.</p> <p>Permanent water source installation was completed on 19 November 2025.</p>
No uncontrolled bushfires that burn more than 50% of the offset area	<ul style="list-style-type: none"> <li>A fire management strategy has been developed for the offset area and commenced.</li> </ul>	<b>Met</b>	<p>Performance indicator met.</p> <p>The requirement to develop and implement a Bushfire Management Plan aligns with <b>Condition 7E of EPBC Act Approval</b>.</p> <p>A Bushfire Management Plan (BMP) was finalised on 24 September 2024.</p> <p>Implementation of the plan commenced on 22 June 2025 with a controlled burn completed by contractor Fireland.</p>
Reduce feral animal density (pigs and dogs)	<ul style="list-style-type: none"> <li>Program for the control of feral animals has been developed and commenced to reduce the presence of pigs and dogs.</li> </ul>	<b>Met</b>	<p>This requirement aligns with <b>Condition 7F of EPBC Act Approval</b>.</p> <p>A Feral Animal Management Program was finalised on 29 August 2024. The document is called the Offset Area Pest Animal Management Plan (PAMP).</p> <p>Implementation of the plan commenced on 20 October 2024 with the first pest shoot. See the PAMP Annual Report for details.</p>

Table 6: Completion criteria and corrective actions, Section 7.3 of the OAMP

Ecological outcome	Year 1 performance indicator	Year 5 performance indicator	Year 10 performance indicator	Year 15 performance indicator	Completion criteria	Corrective actions
Increase the area and quality of habitat for the relevant MNES species.	<ul style="list-style-type: none"> <li>At least 90 percent survival of planted tubestock is observed.</li> <li>At least 70 percent germination of seeds is observed.</li> <li>Natural regeneration of key flora species from all vegetation strata is observed in regrowth areas.</li> </ul>	<ul style="list-style-type: none"> <li>Regeneration and establishment of native plant communities is recorded.</li> <li>No notable areas of dieback are recorded.</li> <li>Net increase in canopy cover is recorded.</li> <li>Increase in habitat scores is recorded as per 5 year milestones in Table 7.6.</li> </ul>	<ul style="list-style-type: none"> <li>Net increase in canopy cover is maintained.</li> <li>Recruitment and regeneration of native plants is maintained.</li> <li>Increase in habitat condition scores is recorded as per 10 year milestones in Table 7.6.</li> </ul>	<ul style="list-style-type: none"> <li>Net increase in canopy cover is maintained.</li> <li>Recruitment and regeneration of native plants is maintained.</li> <li>Increase in habitat condition scores is recorded as per 15 year milestones in Table 7.6.</li> </ul>	<ul style="list-style-type: none"> <li>Restore the RE vegetation across non-remnant and regrowth areas to achieve floristics comparable to that of the relevant RE benchmarks.</li> <li>Achieve required point increase in habitat condition scores.</li> </ul>	Review potential reasons, such as seasonal or climatic conditions or surveying variation, and/or undertake additional management (e.g. watering; active planting of tubestock and/or seeding).
Increase species richness of canopy and shrub level vegetation.	<ul style="list-style-type: none"> <li>At least 90 percent survival of planted tubestock is recorded.</li> </ul>	<ul style="list-style-type: none"> <li>Net increase in canopy and shrub species diversity is recorded.</li> </ul>	<ul style="list-style-type: none"> <li>Net increase in canopy and shrub species diversity is maintained.</li> </ul>	<ul style="list-style-type: none"> <li>Maintain the net increase in canopy and shrub species diversity.</li> </ul>	<ul style="list-style-type: none"> <li>Species richness of canopy layer meets or exceeds RE benchmark.</li> </ul>	Active planting of tubestock.
Increase the cover and diversity of native grass species for southern black-throated finch.	<ul style="list-style-type: none"> <li>At least 70 percent germination of seeds is observed.</li> </ul>	<ul style="list-style-type: none"> <li>Net increase in cover and diversity of target native grass is recorded.</li> </ul>	<ul style="list-style-type: none"> <li>Net increase in cover and diversity of target native grass is maintained.</li> </ul>	<ul style="list-style-type: none"> <li>Net increase in cover and diversity of target native grass is maintained.</li> </ul>	<ul style="list-style-type: none"> <li>Diversity and cover of native grasses is comparable to that of the relevant RE benchmarks.</li> </ul>	Seeding with southern black-throated finch food species.
Reduce weed density	<ul style="list-style-type: none"> <li>Program for weed management has been developed and commenced to reduce the presence of weeds.</li> </ul>	<ul style="list-style-type: none"> <li>Weed management has reduced the density and extent of existing weed infestations.</li> <li>No new weed infestations have established.</li> </ul>	<ul style="list-style-type: none"> <li>No net increase in weed cover is recorded.</li> </ul>	<ul style="list-style-type: none"> <li>No net increase in weed cover is recorded.</li> </ul>	<ul style="list-style-type: none"> <li>Density and extent of shrubby weeds and grassy weeds within the offset area reduced to 70% of baseline level.</li> </ul>	Review and update the weed management program, and implement necessary actions.

Ecological outcome	Year 1 performance indicator	Year 5 performance indicator	Year 10 performance indicator	Year 15 performance indicator	Completion criteria	Corrective actions
Provide artificial permanent water sources	<ul style="list-style-type: none"> <li>Establish artificial permanent water source.</li> </ul>	<ul style="list-style-type: none"> <li>Quality and functionality of artificial permanent water source is maintained.</li> </ul>	<ul style="list-style-type: none"> <li>Quality and functionality of artificial permanent water source is maintained.</li> </ul>	<ul style="list-style-type: none"> <li>Quality and functionality of artificial permanent water source is maintained.</li> </ul>	<ul style="list-style-type: none"> <li>Artificial permanent water source provides suitable quality and quantity of water.</li> </ul>	Repair or modify artificial water source.
No uncontrolled bushfires that burn more than 50% of the offset area	<ul style="list-style-type: none"> <li>A fire management strategy has been developed for the offset area and commenced.</li> </ul>	<ul style="list-style-type: none"> <li>No uncontrolled bushfires that burn more than 50% of the offset area have occurred.</li> </ul>	<ul style="list-style-type: none"> <li>No uncontrolled bushfires that burn more than 50% of the offset area have occurred.</li> </ul>	<ul style="list-style-type: none"> <li>No uncontrolled bushfires that burn more than 50% of the offset area have occurred.</li> </ul>	<ul style="list-style-type: none"> <li>No uncontrolled bushfires that burn more than 50% of the offset area have occurred.</li> </ul>	Review Bushfire Management Plan and implement necessary actions.
Reduce feral animal density (pigs and dogs)	<ul style="list-style-type: none"> <li>Program for the control of feral animals has been developed and commenced to reduce the presence of pigs and dogs.</li> </ul>	<ul style="list-style-type: none"> <li>Feral animal density is lower than that of the baseline.</li> <li>No areas of notable habitat damage by feral animals are recorded.</li> </ul>	<ul style="list-style-type: none"> <li>No net increase in feral animal density is recorded.</li> <li>No areas of notable habitat damage by feral animals are recorded.</li> </ul>	<ul style="list-style-type: none"> <li>No net increase in feral animal density is recorded.</li> <li>No areas of notable habitat damage by feral animals are recorded.</li> </ul>	<ul style="list-style-type: none"> <li>Feral animal densities have been reduced to prevent the degradation of habitat by pigs and prevent koala injury by dogs.</li> </ul>	Review and update the feral animal management program, and implement necessary actions.

Table 7: Habitat quality scores at completion and 5-yearly interim milestones

Assessment unit	Starting habitat quality	Year 5 target (+/- 0.3)	Year 10 target (+/- 0.3)	Year 15 target (+/- 0.3)	Year 20 (Final completion)
<b>Bare-rumped sheathtail bat</b>					
AU2 Remnant 11.3.25b	5.71	6.13	6.55	6.97	7.39
AU3 Remnant 11.3.35	6.19	6.49	6.79	7.09	7.39
AU5 Regrowth 11.3.35	6.07	6.47	6.86	7.25	7.65
AU7 Non remnant 11.3.25b	5.13	5.71	6.28	6.86	7.43
AU8 Non remnant 11.3.35	5.13	5.74	6.34	6.95	7.55
<b>Total</b>	<b>5.75</b>	<b>6.19</b>	<b>6.63</b>	<b>7.06</b>	<b>7.50</b>
<b>Southern black-throated finch</b>					
AU1 Remnant 11.3.12	6.07	6.41	6.74	7.08	7.41
AU2 Remnant 11.3.25b	4.93	5.32	5.71	6.1	6.49
AU3 Remnant 11.3.35	5.5	5.82	6.13	6.45	6.76
AU4 Regrowth 11.3.12	5.41	5.76	6.11	6.45	6.8
AU5 Regrowth 11.3.35	5.28	5.64	5.99	6.35	6.7
AU6 Non remnant 11.3.12	4.38	4.77	5.16	5.54	5.93
AU7 Non remnant 11.3.25b	4.32	4.76	5.21	5.65	6.09
AU8 Non remnant 11.3.35	4.33	4.75	5.17	5.58	6.0
<b>Total</b>	<b>5.05</b>	<b>5.41</b>	<b>5.78</b>	<b>6.14</b>	<b>6.50</b>
<b>Koala</b>					
AU2 Remnant 11.3.25b	4.65	4.91	5.16	5.42	5.67
AU3 Remnant 11.3.35	4.78	5.02	5.27	5.51	5.75
AU5 Regrowth 11.3.35	4.86	5.13	5.4	5.67	5.94
AU7 Non remnant 11.3.25b	4.02	4.48	4.94	5.39	5.85
AU8 Non remnant 11.3.35	3.72	4.14	4.57	4.99	5.41
<b>Total</b>	<b>4.41</b>	<b>4.73</b>	<b>5.04</b>	<b>5.36</b>	<b>5.67</b>

## 4. New Environmental Risks

No new environmental risks have been identified within the current reporting period for the Project. Project environmental risks are managed through Council's Integrated Environmental Management System Framework, Environmental Policy and the Project's management plans.

Details of these project specific plans are as follows.

- Construction Environmental Management Plan (EMP). Delivery and implementation of this plan is facilitated by the construction contractor and governed for effective use by the Council. This Plan is available on Council's website and on-site for all personnel involved in the Project, which includes key aspects such as:
  - Environmental roles and responsibilities,
  - Implementation of the CEMP through awareness training, specific inductions, compliance auditing, and incident, non-compliance and complaint reporting, and
  - Key environmental factors on site including their specific management and controls.
- Erosion and Sediment Control Plan (ESCP). This plan was developed by a Certified Professional in Erosion and Sediment Control in accordance with Best Practice Erosion and Sediment Control guidelines for Australia. This plan sets out:
  - Statutory requirements,
  - Project site description and values, and
  - Erosion hazard assessment and soil loss equation for effective recommendation of erosion and sediment controls, including monitoring and maintenance requirements.
- High-risk Species Management Plan. This plan was developed and approved by the Queensland Department of Environment and Science, for disturbance to breeding places of special least concern, vulnerable and endangered species on site, specifically:
  - Southern Black-throated Finch
  - Squatter Pigeon (Southern)
  - Bare-rumped Sheathail Bat
  - Eastern Osprey
  - Short-beaked Echidna
  - Colonial breeding bats (several species).

## 5. Corrective Actions Summary

### 5.1 Offset Area Management Plan (OAMP)

#### 5.1.1 Monitoring commitments

Partial compliance was identified in meeting the monitoring commitments for revegetation and weeds (Section 3.2.2). For both matters, monitoring commitments between December 2025 and April 2026 could not be met as the Offset Site was inaccessible after unusually high rainfall over the 2025/26 wet season.

##### Corrective actions

Access track upgrades are scheduled for completion in June 2026. The upgrades are intended to improve safe and reliable access to the offset area during and following wet season conditions, thereby reducing the risk of delayed monitoring, maintenance and follow-up management actions. It is acknowledged that access will continue to be managed subject to safety, rainfall, ground conditions and vehicle limitations.

#### 5.1.2 Year 1 Performance Indicators

Non-compliance was identified in meeting the Year 1 Performance Indicators for survival of tubestock and seed germination (Section 3.2.3).

The 2025 revegetation works were undertaken as targeted establishment trials to inform future adaptive management under the OAMP and OARRMP. The trials were designed to test practical survival, germination, species suitability, soil preparation, soil conditioning, planting density, hydrology, wet-season access constraints, maintenance requirements and scalable delivery costs under remote offset area conditions.

##### Corrective actions

Monitoring outcomes from the planted and seeded areas will be reviewed alongside weed control, fire management and natural regeneration outcomes to inform adaptive management under the OAMP and OARRMP. This may include refinement of performance indicators, future revegetation timing, planting densities, treatment extents, species selection, seed mixes, site preparation, watering requirements and maintenance methods.

Future revegetation decisions will be directed toward achieving the approved OAMP ecological outcomes and completion criteria, including improvement in habitat quality and restoration of relevant vegetation communities, rather than relying on any single establishment method in isolation. Where performance indicators are not met, corrective actions will be selected having regard to monitoring evidence, site constraints, safety, access, cost-effectiveness and the likelihood of achieving durable ecological outcomes.

Engagement with DCCEEW is proposed to review the suitability of revegetation performance indicators defined in the OAMP and OARR. Initial implementation outcomes indicate that certain indicators (e.g. tubestock survival and seed germination thresholds) may not be achievable under site conditions and may not effectively measure progress toward restoration outcomes. Consistent with the adaptive management framework, Council intends to work with the Department to refine indicators to better reflect ecological recovery (including natural regeneration, recruitment and habitat condition), while maintaining alignment with the approved offset objectives.

### 5.2 Timing

The EPBC Act approval was granted on **23 February 2023** and includes the requirement to prepare an Annual Compliance Report from that date. The OARR, WMP, PAMP and BMP were subsequently established in **late 2024** and each includes annual reporting requirements from the respective plan's commencement date:

- The OARR was established on **2 December 2024**.
- The WMP was established on **2 October 2024**.

- The PAMP was established on **29 August 2024**.
- The BMP was established on **24 September 2024**.

This document is the Year 3 Annual Compliance Report for the EPBC Act approval, suggesting that the Year 3 performance indicators are relevant to this report. However, this is the first reporting period for the OARR, WMP, PAMP and BMP, which places each of those reports, and their relevant performance indicators, approximately at Year 1.

The misalignment of reporting periods creates inefficiencies, duplication across reports, and confusion regarding actions and performance indicators assigned to “Year 1”, where that year is defined differently between reports.

### Corrective actions

It is recommended that the timing of annual reporting requirements and performance indicators in the OAMP, OARR, WMP, PAMP and BMP be reviewed to align with the timing of the EPBC Act approval Annual Compliance Report from 2027 onwards.

The purpose of the timing realignment is to improve efficiency, reduce duplication across reports, and provide consistent timing for actions and performance indicators.



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