EPBC Act Approval Second Annual Compliance Report

Haughton Pipeline Stage 2

26000226

20 May 2025

KLEINFELDER
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EPBC Act Approval Second Annual Compliance Report

Haughton Pipeline Stage 2

Kleinfelder Project: 26000226

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Prepared	Reviewed	Endorsed
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Declaration of accuracy

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: B. Middleton

Full name: Blair Middleton

Position: Principal, Major Projects – Infrastructure and Operations

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

Date: 20 MAY 2025

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1 INTRODUCTION

1.1 GENERAL

Kleinfelder Australia Pty Ltd (Kleinfelder) was engaged by Townsville City Council (TCC) to prepare the second Annual Compliance Report for the Haughton Pipeline Stage 2 Project (HPS2 or the Project). The Project is located approximately 60 kilometres south-east of Townsville.

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 28.5km 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 EPBC Act Approval was 23 February 2023, this report provides an assessment of compliance against each of the conditions between the period of 23 February 2024 to 23 February 2025.

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, requiring assessment by preliminary documentation, which occurred in the following key stages:

- A Preliminary Documentation (PD) report was prepared in response to DCCEEW's Request for Information following the Referral assessment, on 10 March 2022.
- After submission of the PD, the Department provided an adequacy response on 9 September 2022.
- The Project then entered into the public exhibition stage, for which public comments were consolidated and provided by the department on the 19 December 2022 for review and addressing.
- Conditioned approval was received on the 23 February 2022.

The total temporary disturbance footprint is 138.26 ha consisting of:

- Construction corridor for the 28.5 km long pipeline alignment – typically consisting of a 40 m wide corridor (for clearing activities, trenching works, pipe installation, fencing and stockpiling of excavated material and topsoil are to be accommodated within the pipeline clearance extents) reducing to a 20 m wide corridor at riparian zones and mapped watercourse/waterway crossing, and
- Temporary construction access and haulage roads and five stockpile/laydown areas for storing materials and equipment.

The total permanent disturbance footprint is 15.64 ha consisting of:

- A 4 m wide gravel access road along the length of the pipeline.
- Pump station, as per the extent of the pump station site (1.63 ha).
- Intake structure including 11.52 ha for intake structure and access road.
- Substation site including 1.7 ha to establish substation.
- Power supply works including 0.8 ha for overhead power utility easement and access road.

Operation and maintenance of the Project will involve the ongoing maintenance of a 21.5 m wide public utility easement, 10 m wide zone influence above the pipeline (where only ground layer stratum is proposed), 4 m wide permanent gravel access road for the length of the pipeline and operation of the pump station and substation.

2.2 ACTIVITIES DURING REPORTING PERIOD

Project activities that occurred during the reporting period (23 February 2024 to 23 February 2025) are detailed below:

- Continued delineation of construction corridor limits of clearing.
- Completed Vegetation clearing (excluding water pump station, high voltage substation and powerline easement).
- Ongoing establishment of laydowns, stockpile pads and access roads.
- Commenced implementation of Offset Area Management Plan activities.
- Underground pipeline over 50% 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 2025. Due to the low-lying nature of the HPS2 project site and the accumulated rainfall, the construction program has been delayed due to most areas being still inaccessible in April and May 2025.

3 COMPLIANCE ASSESSMENT

An assessment of compliance against EPBC Act Approval (EPBC 2021/9002) for the reporting period between 23 February 2024 and 23 February 2025, is provided in Table 2 and Table 3 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.

A variation to the EPBC Act Approval (EPBC 2021/9002) conditions was sought with the amended decision notice provided on 12 March 2025. The original conditions were retained with only condition 7 varied to include added conditions 7B to 7G provided in Table 2.

Table 2: Compliance Assessment against EPBC Approval Conditions

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
Part A- Conditions Specific to the Action				
Maximum Clearing Limits				
1)	The approval holder must not **clear** outside the **Project Area**	Yes	Non-compliant	The first Annual Compliance Report (Kleinfelder, 2024) documented non- compliance with this condition. The total approved *project area* encompasses 154.036ha. The area of clearing reported in the first Annual Compliance Report (Kleinfelder, 2024) identified approximately 108.39ha had been cleared in the 12-month period. An email was provided to the department on 21 May 2024 reporting this non-compliance, with a follow up email provided on 4 June 2024 detailing corrective actions for this non-compliant condition. The corrective actions include submitting a variation to this condition in September 2024 as part of the minor change application to more accurately reflect the *project area.* The variation was noted to result in a reduction of the *project area* disturbance footprint by approximately 2.36ha. Surveys were conducted at the Project site on 30 April 2025 to ground-truth clearing survey data relevant to the reporting period (23 February 2024 to 23 February 2025). Approximately 22.6ha has been cleared in this 12-month reporting period (23 February 2024 and 23 February 2025), bringing the total cleared *project area* to date to 130.99ha of the approved 154.036ha. As shown in **Appendix B**, approximately 0.41ha at the southern end of the HPS2 project alignment has been disturbed outside of the approved *project area*. This 0.41ha is included as part of the amended *project area* submitted in the minor change application which is still being assessed.

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
2)	The approval holder must not **clear** more than the following:			
	a) 96.34ha of **Southern Black-throated Finch habitat**	Yes	Compliant	The first Annual Compliance Report (Kleinfelder, 2024) documented compliance with this condition. The area of *Southern Black-throated Finch habitat* clearing reported in the first Annual Compliance Report (Kleinfelder, 2024) identified approximately 68.23ha had been cleared in the 12-month period. Surveys were conducted at the Project site on 30 April 2025 to ground-truth clearing survey data relevant to the reporting period (23 February 2024 to 23 February 2025). Survey data was found to be accurate on the ground. Approximately 9.68ha has been cleared in this 12-month reporting period (23 February 2024 and 23 February 2025), bringing the total cleared *Southern Black-throated Finch habitat* to date to 77.91ha. A minor change application was submitted 9 February 2024 to vary this condition to more accurately reflect the disturbance to *Southern Black-throated Finch habitat*. The variation was noted to result in a reduction of the *Southern Black-throated Finch habitat* disturbance by approximately 2.36ha.

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
	b) 134.2 ha of **Koala habitat**	Yes	Compliant	The first Annual Compliance Report (Kleinfelder, 2024) documented compliance with this condition. The area of *Koala habitat* clearing reported in the first Annual Compliance Report (Kleinfelder, 2024) identified approximately 89.73ha had been cleared in the 12-month period. Surveys were conducted at the Project site on 30 April 2025 to ground-truth clearing survey data relevant to the reporting period (23 February 2024 to 23 February 2025). Survey data was found to be accurate on the ground. Approximately 21.40 ha has been cleared in this 12-month reporting period (23 February 2024 and 23 February 2025), bringing the total cleared *Koala habitat* to date to 111.13ha. A minor change application was submitted 9 February 2024 to vary this condition to more accurately reflect the disturbance to *Koala habitat*. The variation was noted to result in a reduction of the *Koala habitat* disturbance by approximately 2.36ha.

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
	c) 92.23 ha of **Bare-rumped Sheathtail Bat** habitat comprising no more than: i) 43.12 ha of **Bare-rumped Sheathtail Bat roosting habitat** ii) 85.54 ha of **Bare-rumped Sheathtail Bat foraging habitat**	Yes	Compliant	The first Annual Compliance Report (Kleinfelder, 2024) documented compliance with this condition. The area of *Bare-rumped Sheathtail Bat habitat* clearing reported in the first Annual Compliance Report (Kleinfelder, 2024) identified approximately 62.82 hectares of *Bare-rumped Sheathtail Bat habitat* cleared during the 12-month period, consisting of: • 24.88ha Roosting habitat, and • 37.27ha Foraging habitat. Surveys were conducted within the Project area on 30 April 2025 to ground-truth clearing survey data relevant to the reporting period (23 February 2024 to 23 February 2025). Survey data was found to be accurate on the ground. Approximately 11.13 ha has been cleared of *Bare-rumped Sheathtail Bat habitat* in this 12-month reporting period (23 February 2024 and 23 February 2025) consisting of: • 8.12 ha Roosting habitat, and • 3.01ha Foraging habitat. This brings the totals for cleared *Bare-rumped Sheathtail Bat habitat* to date to 73.95 ha consisting of: • 33 ha Roosting habitat, and • 40.28 ha Foraging habitat. A minor change application was submitted 9 February 2024 to vary this condition to more accurately reflect the disturbance to *Bare-rumped Sheathtail Bat habitat.* The variation was noted to result in a reduction of the *Bare-rumped Sheathtail Bat habitat* disturbance by approximately: • 2.36ha total *Bare-rumped Sheathtail Bat*, and • 2.36 ha roosting habitat. No change was submitted to vary the total approved foraging habitat.

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
Rehabilitation Requirements				
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	Not Applicable	Substantial completion of construction has not occurred within the reporting period (23 February 2024 to 23 February 2025) and as such this condition was not assessed as part of this Annual Compliance Report.
4)	Within 20 **business days** of substantial completion of **construction**, the approval holder must commence implementing the **Rehabilitation Management Plan**.	No	Not Applicable	Substantial completion of construction has not occurred within the reporting period (23 February 2024 to 23 February 2025) and as such this condition was not assessed as part of this Annual Compliance Report.
5)	Within 60 **business days** following 1-year anniversary of the date commencing implementation of the **Rehabilitation Management Plan**, the approval holder must submit a report to the **department** which provides evidence the **rehabilitation areas** have achieved **acceptance criteria**.	No	Not Applicable	Commencement of implementation of the Rehabilitation Management Plan (RMP) has not occurred within the reporting period (23 February 2024 to 23 February 2025) and as such this condition was not assessed as part of this Annual Compliance Report.
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	Not Applicable	Commencement of implementation of the Rehabilitation Management Plan and assessment of acceptance criteria has not occurred within the reporting period (23 February 2024 to 23 February 2025) and as such this condition was not assessed as part of this Annual Compliance Report
Environmental Offset Requirements				
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 **commencement of the action** and continue to implement it for the remainder of the life of the approval. The approval holder must:	Yes	Compliant	The first Annual Compliance Report (Kleinfelder, 2024) documented compliance with this condition. The date for commencement of the 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. The commencement of the Action occurred, following implementation of the OAMP, on 14 August 2023, as evidenced by an email on 25 August 2023 to the Department notifying of commencement of the Action.

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
	a) notify the **Department** in writing of the date of commencing **OAMP** implementation within 20 **business days** of the date of commencing **OAMP** implementation.	Yes	Compliant	The date for commencement of the 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.
	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.	No	Not applicable.	A Weed Management Plan (Kleinfelder, 2024) that meets the requirements of the OAMP was developed and finalised on 2 October 2024. Implementation from date of the varied approval (12 March 2025) will be assessed in the next compliance report (23 February 2025 to 23 February 2026).
	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.	No	Not applicable.	A Revegetation and Rehabilitation Management Plan (Kleinfelder, 2024) was developed and finalised on 2 December 2024. The plan includes a monitoring and maintenance schedule that meets the requirements of the OAMP. Commencement of the plan by 1 May 2025 will be assessed for compliance in the next compliance report (23 February 2025 to 23 February 2026).
	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.	No	Not applicable.	Installation of the permanent water source by 30 June 2025 will be assessed in the next compliance report (23 February 2025 to 23 February 2026).
	e) 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.	No	Not applicable.	A Bushfire Management Plan (Terra Solutions, 2024) that meets the requirements of the OAMP was developed and finalised 31 July 2024. Implementation of the plan by 1 July 2025 will be assessed in the next compliance report (23 February 2025 to 23 February 2026).

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
	f) 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.	No	Not applicable.	Baseline pest monitoring was conducted in accordance with relevant guidelines between April and July 2024 and development of a property-wide feral animal management program was finalised on the 29 August 2024. Implementation from date of the varied approval (12 March 2025) will be assessed in the next compliance report (23 February 2025 to 23 February 2026).
	g) 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.	No	Not applicable.	Conditions 7B, 7C, 7D, 7E and 7F will be assessed within the next compliance report (23 February 2025 to 23 February 2026).
8)	If the **Southern Black-Throated Finch** has not been detected within the **Offset Area** within 3 years of the date of commencing the OAMP implementation, the approval holder must provide to the **department** within 20 **business days** of the 3-year anniversary of the date of commencing the **OAMP** implementation, a report that includes:	No	Not Applicable	Note, surveys for presence of the Southern Black-throated Finch are to be conducted yearly as per the OAMP and this condition to allow accurate reporting on the 3-year anniversary, however this condition was not assessed as part of this Annual Compliance Report. Surveys are ongoing and will be assessed 17 July 2026.
	a) A detailed description of the survey method, timing and effort undertaken to detect the **Southern Black-Throated Finch** in the **Offset Area**,	No	Not Applicable	This condition was not assessed as part of this Annual Compliance Report.
	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	No	Not Applicable	This condition was not assessed as part of this Annual Compliance Report.
	c) The additional actions the approval holder proposes to undertake to increase the likelihood of detecting **Southern Black-Throated Finch** in the **Offset Area**.	No	Not Applicable	This condition was not assessed as part of this Annual Compliance Report

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
9)	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:	No	Not Applicable	This condition was not assessed as part of this Annual Compliance Report, as the reporting timeframes for this condition have not been triggered.
	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.	No	Not Applicable	This condition was not assessed as part of this Annual Compliance Report
	b) Describe the results and effectiveness of all management actions implemented during the period the subject of the current OAMP Report.	No	Not Applicable	This condition was not assessed as part of this Annual Compliance Report
	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	No	Not Applicable	This condition was not assessed as part of this Annual Compliance Report
	d) Detail any interim performance targets not met, describe all corrective actions taken and evaluate their effectiveness. 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.	No	Not Applicable	This condition was not assessed as part of this Annual Compliance Report

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
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	Not Applicable	This condition was not assessed as part of this Annual Compliance Report as it is not applicable to the reporting period (23 February 2024 to 23 February 2025).
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	Not Applicable	This condition was not assessed as part of this Annual Compliance Report as it is not applicable to the reporting period (23 February 2024 to 23 February 2025).
Legal Securing of Environmental Offsets				
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**.	Yes	Compliant	The Commencement of the Action occurred on 14 August 2023. Legally securing the Offset Area within 12 months from commencement of Action sets a final delivery date of 14 August 2024. The area was approved as a Declared Area by the Queensland Department of Resources on 10 May 2024.
13)	The approval holder must provide written evidence to the **department** within 10 **business days** of the **Offset Area** being **legally secured**.	Yes	Compliant	Notification to the department for the approved Declared Area was provided via letter on 17 May 2024.

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
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.	Yes	Compliant	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.
Revision of Action Management Plans				
15)	The approval holder may, at any time, apply to the **Minister** for a variation to the 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	Not Applicable	The plans associated with the EPBC Approval (2021/9133) have not been varied during the reporting period.
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: a) of this approval, if the version of the **plan** to be implemented is specified in these conditions, **or**	Yes	Compliant	The first Annual Compliance Report (Kleinfelder, 2024) documented a non-compliance with this condition. An email was provided to the department on 21 May 2024 reporting this non-compliance, with a follow up email provided on 4 June 2024 detailing corrective actions for this non-compliant condition. Corrective actions included establishing a procedure and specific website for all project related plans. This procedure has been successful through the provision of all supplementary management plans to the OAMP to the department in a timely manner as required by the approval condition.
	b) the **plan** is approved by the **Minister** in writing if the **plan** requires the approval of the **Minister**.	No	Not Applicable	

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
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	Compliant	The first Annual Compliance Report (Kleinfelder, 2024) documented compliance with this condition as evidenced by the documents being sighted on the website linked below. The plans associated with the EPBC Approval (2021/9133) are the OAMP and RMP, which are both published on the website at the following location: Projects - Environmental Approval Documents - Townsville City Council.
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 pubic.	Yes	Compliant	The first Annual Compliance Report (Kleinfelder, 2024) documented compliance with this condition. The OAMP and RMP do not contain any sensitive ecological data. The OAMP has mapped broad suitable habitat and publicly available records for the relevant MNES within the document, which is not considered *sensitive ecological data*. The RMP is exclusively on rehabilitation of the HPS2 Project site, and as such does 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	Compliant	The first Annual Compliance Report (Kleinfelder, 2024) documented compliance with this condition. No *sensitive ecological data* has been excluded or redacted from the OAMP or RMP.
Part B – Administrative Conditions				
Notification of Date of Commencement of the Action				
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**.	Yes	Compliant	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.

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
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**.	Yes	Compliant	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.
Compliance Records				
22)	The approval holder must maintain accurate and complete **compliance records**.	Yes	Compliant	The approval holder has provided accurate and complete compliance records for this 12-month reporting period (23 February 2024 to 23 February 2025).
23)	If the **department** makes a request in writing, the approval holder must provide electronic copies of the **compliance records** to the **department** within the timeframes specified in the request.	Yes	Not Applicable	No request from the Department has been made during the reporting period (23 February 2024 to 23 February 2025).
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 *Guidelines for biological survey and mapped data*, Commonwealth of Australia 2018, or as otherwise specified by the **Minister** in writing.	Yes	Compliant.	Monitoring data (including *sensitive ecological data),* surveys, maps and other spatial data to be prepared ongoing for the life of the approval or otherwise specified in the conditions or plan commitments, as required by this approval includes: • Spatial data collected for clearing of protected matters in the HPS2 project area. • Surveys for the Southern Black-throated Finch in the Offset Area. • Surveys and/or monitoring required by the OAMP management actions. Monitoring data, surveys, maps and other spatial data specified above collected as part of this 12-month reporting period (23 February 2024 to 23 February 2025) will be assessed as being prepared in accordance with *Guidelines for biological survey and mapped data*, Commonwealth of Australia 2018 in the next 12-month reporting period.

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
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 *Guide to providing maps and boundary data for EPBC Act projects*, Commonwealth of Australia 2021, or as otherwise specified by the **Minister** in writing.	Yes	Compliant.	Monitoring data (including *sensitive ecological data),* surveys, maps and other spatial data to be prepared ongoing for the life of the approval or otherwise specified in the conditions or plan commitments, as required by this approval includes: • Spatial data collected for clearing of protected matters in the HPS2 project area. • Surveys for the Southern Black-throated Finch in the Offset Area. • Surveys and/or monitoring required by the OAMP management actions. Monitoring data, surveys, maps and other spatial data specified above collected as part of this 12-month reporting period (23 February 2024 to 23 February 2025) will be assessed in accordance with *Guide to providing maps and boundary data for EPBC Act projects*, Commonwealth of Australia 2021 in the next 12-month reporting period.

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
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	Compliant	Monitoring data collected in the previous 12-month reporting period (23 February 2023 to 23 February 2024) that was submitted to the department included: • Spatial data collected for clearing of protected matters in the HPS2 project area. • Surveys and/or monitoring required by the OAMP management actions, documented in both the first Annual Compliance Report (Kleinfelder, 2024) and the supplementary management plans developed as required by the OAMP management actions. Survey data for the Southern Black-throated Finch is collected in each 12-month reporting period, however it is not required to be submitted to the department until the anniversaries of the implementation of the OAMP in accordance with Condition 8 and Condition 9. Monitoring data, surveys, maps, other spatial data and all species occurrence records data specified above, collected as part of this 12-month reporting period, is required to be submitted electronically to the Department by TCC and will be assessed in the next 12-month reporting period.
Annual Compliance Reporting				
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	Compliant	This compliance report is for the second 12-month period following the date of this approval, being 23 February 2024 to the 23 February 2025.
28)	The approval holder must ensure that each **compliance report** is consistent with the *Annual Compliance Report Guidelines*, Commonwealth of Australia 2014.	Yes	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:	Yes	Compliant	This compliance report presents details in line with this condition.

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
	a) Accurate and complete details of compliance and any non-compliance with the conditions and the **plans**, and any **incidents**.	Yes	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.
	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.	Yes	Compliant	Clearing of protected matters between 23 February 2024 and 23 February 2025 were surveyed, with shapefiles produced and provided with this annual compliance report.
	c) All confirmed sightings, injuries, and mortalities of **listed threatened species** in a format consistent with the **Guidelines for biological survey and mapped data**.	Yes	Compliant	Sighting, injuries and mortalities of listed threatened species were reviewed via: • Incidental observations of listed threatened species occurrence in the project area, where there were any. • Project Site pre-clearing surveys and the animal breeding place register completed in line with the High-risk Species Management Program requirements, governed by the Queensland Department of Environment and Science. There were no findings in accordance with this condition for this 12-month reporting period (23 February 2024 and 23 February 2025).

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
	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	Compliant	The plans relating to the EPBC Approval (2021/9133) conditions are the RMP and OAMP. Supplementary management plans were developed as required by the OAMP management actions which include: • EPBC 2021/9133 Offset Area Revegetation and Rehabilitation Management Plan • EPBC 2021/9133 Offset Area Weed Management Plan • EPBC 2021/9133 Offset Area Pest Animal Management Plan • EPBC 2021/9133 Offset Area Bushfire Management Plan Compliance assessment of the implementation of the OAMP is set out in **Table 3**. To note, in line with Condition 9 a to d, compliance assessment of the OAMP, and therefore the four supplementary management plans listed above, is subject to 12-month reporting periods from the original date of OAMP implementation (17 July 2023). **Table 3** therefore provides partial details for the implementation of the OAMP and each supplementary plan relevant to this annual compliance report 12-month reporting period (23 February 2024 and 23 February 2025). The implementation of the RMP has not been assessed as part of this reporting period as no activities under the plan have commenced.
30)	The approval holder must:			
	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.	Yes	Compliant	The first Annual Compliance Report (Kleinfelder, 2024) was published on the Townsville City Council Project website in accordance with this condition on 21 May 2024.
	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	Compliant	The department was notified electronically that the first Annual Compliance Report (Kleinfelder, 2024) was published on the Townsville City Council Project website on 21 May 2024.
	c) Provide the weblink for the **compliance report** in the notification to the **Department**.	Yes	Compliant	The Department was notified of publication of the first Annual Compliance Report (Kleinfelder, 2024) with a weblink included.

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
	d) Keep all published **compliance reports** required by these conditions on the **website** until the expiry date of this approval.	Yes	Compliant	The first Annual Compliance Report (Kleinfelder, 2024) was published and is available at this link (Projects – Environmental Approval Documents - Townsville City Council) on the Townsville City Council project website.
	e) Exclude or redact **sensitive ecological data** from **compliance reports** published on the **website** or otherwise provided to a member of the public.	Yes	Compliant	The first Annual Compliance Report (Kleinfelder, 2024) did not contain any *sensitive ecological data.* This annual compliance report will 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	Compliant	The first Annual Compliance Report (Kleinfelder, 2024) did not contain any *sensitive ecological data.* This annual compliance report will not contain any *sensitive ecological data.*
Reporting Non-compliance				
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	Compliant	Kleinfelder was provided evidence by Townsville City Council in the form of an email to the department on 21 May 2024 reporting non-compliance with two conditions and several commitments made within the OAMP, which included the details required by Condition 32 a to c.
32)	The approval holder must specify in the notification:			
	a) Any condition or commitment made in a **plan** which has been or may have been breached,			
	b) A short description of the **incident** and/or potential non-compliance and/or actual non-compliance,			
	c) The location (including co-ordinates), date, and time of the **incident** and/or potential non-compliance and/or actual non-compliance.			

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
33)	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: a) any corrective action or investigation which the approval holder has already taken, b) the potential impacts of the **incident** and/or non-compliance, and c) the method and timing of any corrective action that will be undertaken by the approval holder.	Yes	Compliant	Kleinfelder was provided evidence by Townsville City Council in the form of an email to the department on 4 June 2024 reporting non-compliance with two conditions and several commitments made within the OAMP, which included the details required by Condition 33 a to c.
Independent Audit				
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	Not Applicable	The commencement of the Action occurred on the 14 August 2023. The first independent audit will not be required until 2028, as such this condition does not apply to this Annual Compliance Report.
35)	For each **independent audit**, the approval holder must: Provide the name and qualifications of the nominated **independent** auditor, the draft audit criteria, and proposed timeframe for submitting the **audit report** to the **department** prior to commencing the **independent audit**. 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**. Submit the **audit report** to the **department** for approval within the timeframe specified and approved in writing by the **department**.	No	Not Applicable	This condition does not apply to this Annual Compliance Report.

Condition #	Condition	Condition Currently Triggered	Compliance Assessment	Findings including evidence and comments
	Publish each **audit report** on the **website** within 15 **business days** of the date of the **department's** approval of the **audit report**. Keep every **audit report** published on the **website** until this approval expires.			
36)	Each **audit report** must report for the five-year period preceding that audit report.	No	Not Applicable	Note, compliance records for this reporting period must be kept by Townsville City Council to allow auditing as per this condition. This condition does not apply to this Annual Compliance Report.
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	Not Applicable	This condition does not apply to this Annual Compliance Report.
Completion of the Action				
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	Not Applicable	This condition was not assessed as part of this Annual Compliance Report as it is not applicable to the 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	Not Applicable	Completion of the Action has not occurred within the reporting period (23 February 2024 to 23 February 2025) and as such this condition was not assessed as part of this Annual Compliance Report.

There are two plans associated with the EPBC Act Approval (2021/9133) which are:

- the Rehabilitation Management Plan governing rehabilitation of the Project Area, and
- the Offset Area Management Plan, which sets out management actions to be undertaken within the offset area for achievement of ecological outcomes/completion criteria that align with the EPBC Act approval and offset significant impacts of the project on MNES. The OAMP also includes four supplementary management plans:
    - EPBC 2021/9133 Offset Area Revegetation and Rehabilitation Management Plan
    - EPBC 2021/9133 Offset Area Weed Management Plan
    - EPBC 2021/9133 Offset Area Pest Animal Management Plan
    - EPBC 2021/9133 Offset Area Bushfire Management Plan

The Rehabilitation Management Plan has not been triggered for implementation as construction of the Project is ongoing, therefore it has not been assessed for compliance during this reporting period.

A variation to the EPBC Act Approval (EPBC 2021/9002) conditions was sought with the amended decision notice provided on March 12, 2025. The original conditions were retained with only condition 7 varied to include added conditions 7B to 7G provided in Table 2, which are directly associated with the four supplementary management plans for the OAMP listed above.

The OAMP commenced implementation on 17 July 2023 and as such requires compliance assessment of relevant management actions, interim milestones and monitoring commitments for this reporting period (23 February 2024 to 23 February 2025) as detailed in Table 3. The interim milestones in Table 7.5 of the OAMP (Appendix A) and are assessed at 5-yearly intervals, therefore they are not applicable to this 12-month reporting period (23 February 2024 to 23 February 2025).

Table 3: Compliance Assessment of Implementation of the Offset Area Management Plan

Action #	Management Action / Plan Commitment	Relevant Plan Interim Milestones, Monitoring and/or Aims	Compliance Assessment	Findings including evidence and comments
Offset Area Management Plan Commitments				
1	*Legally securing Offset Area* The proponent will follow the process outlined in the Guide to Voluntary Declarations under the VM Act (effective 21 June 2019) to obtain the VDec, which is summarized below. A Request for a VDec application is submitted to the Queensland Department of Resources (DoR), including written consent from all registered owners, a description of the purpose of the VDec and how the area meets the criteria of high nature conservation value, and a copy of the Offset Area Management Plan. The DoR will assess the VDec request to ensure it meets all criteria required and to ensure the management plan contains the appropriate elements to ensure the declared area is managed to achieve the desired outcomes. Once the DoR is satisfied that the VDec request meets the criteria for a declaration, a VDec offer will be sent that includes a draft: • Declaration notice. • Declared area code (if proposed).	Not applicable	Compliant	The area was approved as a Declared Area by the Queensland Department of Resources on 10 May 2024 as evidenced by a letter provided to Townsville City Council. The letter included a declaration notice, declared area map, property map of assessable vegetation (PMAV) and an information notice for the PMAV.

Action #	Management Action / Plan Commitment	Relevant Plan Interim Milestones, Monitoring and/or Aims	Compliance Assessment	Findings including evidence and comments
	• Property Map of Assessable Vegetation (PMAV) showing the area as Category A vegetation, giving it a high level of protection similar to endangered regional ecosystems within a Category B area. • Declared area management plan, including map of the declared area. After the DoR and the proponent agree to the offer, DoR will make the declaration and provide a finalised VDec package. The declaration takes effect from the date the chief executive signs the declaration notice. The offset area management plan has effect under the VDec process from the same date. The VDec will be applied over the offset areas in perpetuity. There are no statutory timeframes for the VDec application and approval process.			
2	*Revegetation and Regeneration Management* Within 6 months of Project approval by DCCEEW, revegetation will commence within nominated areas. The rehabilitation program will be undertaken by a suitably qualified bush regeneration contractor and will include measures to ensure the maintenance and survival of new nesting trees (Southern Black-Throated Finch) and roosting trees (Bare-rumped Sheathtail bat) in the offset sites. Within mapped regrowth areas, natural regeneration is preferred to the reconstruction of the vegetation community (i.e., soil improvements, dense planting etc.). Management of these areas will focus on controlling weeds and restricting access from vehicles or stock animals, or other existing significant disturbances, in order to promote further growth and new seedlings. Where natural regeneration is unsuccessful, minor infill planting will be implemented to facilitate recovery. A planting program will be designed for areas where disturbances occur within the offset sites (e.g., non-remnant). The species selected will be site-specific and dependent on localised habitat features and landforms, and consistent with the mapped regional ecosystem or pre-cleared	Refer Appendix A for OAMP Table 7.7 for relevant revegetation and rehabilitation monitoring frequencies and methodologies.	Partially Compliant	This commitment was reported as a non-compliance in the first Annual Compliance Report (Kleinfelder, 2024). This commitment is considered partially compliant as there are actions required by Condition 7C that have been completed, as well as actions that are not required to be assessed until the subsequent 12-month reporting period (23 February 2025 to 23 February 2026). A Revegetation and Rehabilitation Management Plan (Kleinfelder, 2024) was developed and finalised on 2 December 2024 which aligns with Condition 7C. The 2021/9133 Offset Area Revegetation and Rehabilitation Management Plan (Kleinfelder, 2024) includes a planting program for non-remnant areas, natural regeneration actions for regrowth areas and a monitoring and maintenance schedule to be implemented following active revegetation. There are three key zones in the offset area with differing revegetation and rehabilitation priorities and timeframes.

Action #	Management Action / Plan Commitment	Relevant Plan Interim Milestones, Monitoring and/or Aims	Compliance Assessment	Findings including evidence and comments
	regional ecosystem over the area, with key focus also on providing native grass food species for the Southern Black-Throated Finch. A monitoring and maintenance schedule will be implemented to provide adequate watering, weed control and replacement of tubestock or re-seeding, as necessary.			Monitoring has not occurred in line with Table 7.7 of the OAMP as revegetation has not been triggered during this 12-month reporting period. Commencement of the plan by 1 May 2025 will be assessed for compliance in the next compliance report (23 February 2025 to 23 February 2026).
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. Methods for weed control will be site-specific and appropriate to each species, with regards to best practice and relevant guidelines, such as: – Townsville City Biosecurity Plan 2020 – 2024. – Biosecurity Queensland fact sheets. Treatment options should be undertaken using an integrated approach. Methods may involve a combination of physical, chemical and/or biological methods, depending on the species and extent of infestations. Fire management as discussed below should also form part of the overall integrated approach. Some species may require subsequent treatments due to viability of seed banks for longer periods. Prior to any use of mechanical clearing, proposed treatment sites should be examined, and desirable trees and regrowth clearly marked with pink flagging tape to help reduce native vegetation. Appropriate minor use permits from the Commonwealth Australian Pesticides and Veterinary Medicines Authority may apply.	Refer Appendix A for OAMP Table 7.7 for relevant weed management monitoring frequency and methodology.	Partially Compliant	This commitment was reported as a non-compliance in the first Annual Compliance Report (Kleinfelder, 2024). Weed management works occurred within 6 months of the project approval as reported in the first Annual Compliance Report (Kleinfelder, 2024). This commitment is considered partially compliant as there are actions required by Condition 7B that have been completed, as well as actions that are not required to be assessed until the subsequent 12-month reporting period (23 February 2025 to 23 February 2026). A Weed Management Plan (Kleinfelder, 2024) was developed and finalised on 2 October 2024 which aligns with Condition 7B. The 2021/9133 Offset Area Weed Management Plan (Kleinfelder, 2024) includes monitoring survey methodologies that align with Table 7.7 of the OAMP, and various options for weed management according to each zone. Weed monitoring in line with Table 7.7 of the OAMP and the 2021/9133 Offset Area Weed Management Plan (Kleinfelder, 2024) is now subject to Condition 7B. The March / April 2025 weed survey proposed in the 2021/9133 Offset Area Weed Management Plan (Kleinfelder, 2024) has not occurred due to inaccessibility to the site as a result of the north Queensland rainfall events. An email was provided to the

Action #	Management Action / Plan Commitment	Relevant Plan Interim Milestones, Monitoring and/or Aims	Compliance Assessment	Findings including evidence and comments
				department on 10 April 2025 detailing the rainfall received and included drone footage of the Offset Area demonstrating inaccessibility during the weed monitoring survey window. Implementation from date of the varied approval (12 March 2025) will be assessed in the next compliance report (23 February 2025 to 23 February 2026).
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). Feral cats have been observed ambushing birds, including finches, at cattle troughs (NRA 2011). The permanent water source will consist of a windmill and water trough mounted on extended legs, with suitable perches. The provision of artificial permanent water sources will ensure that a water source is accessible within 400 m from any location within the Offset Area.	Not applicable.	Not Applicable.	This commitment was reported as a non-compliance in the first Annual Compliance Report (Kleinfelder, 2024). Townsville City Council sought a variation to the EPBC Approval conditions in which the department conditioned the installation of the permanent water source by 30 June 2025 (Condition 7D). Townsville City Council have engaged a contractor to install the water source which is expected to occur before the 30 June 2025 deadline. The contractor will complete the works when the offset area becomes accessible, and inductions are completed. This commitment will be assessed in the subsequent 12-month reporting period (23 February 2025 to 23 February 2026).
5	*Fire Management* Within 12 months of Project approval, a Bushfire Management Plan will be developed and implemented. A review of historical fire management efforts and fire history will be undertaken for the proposed Offset Areas and surrounds. Fire management actions will be planned and implemented with the aim of protecting the Offset Area and Southern Black-Throated Finch habitat values and resources. The Queensland Herbarium (2021b) provides fire management guidelines for each of the Queensland Regional Ecosystems that occur within the Offset Area and are described in Table 7.4.	Not applicable.	Partially Compliant	This commitment was reported as a non-compliance in the first Annual Compliance Report (Kleinfelder, 2024). This commitment is considered partially compliant as there are actions required by Condition 7E that have been completed, as well as actions that are not required to be assessed until the subsequent 12-month reporting period (23 February 2025 to 23 February 2026). A Bushfire Management Plan (Terra Solutions, 2024) was developed and finalised 31 July 2024 which aligns with Condition 7E.

Action #	Management Action / Plan Commitment	Relevant Plan Interim Milestones, Monitoring and/or Aims	Compliance Assessment	Findings including evidence and comments
	Although the Queensland Herbarium (2021b) guidelines are developed for the general maintenance of a regional ecosystem and needs to be considered, they are not tailored to promote and maintain suitable foraging grasses for Southern Black-Throated Finch. Fire management should therefore aim to meet the Habitat Management Guidelines (NRA 2011) performance indicators for managing fire for Southern Black-Throated Finch habitat. A fire management strategy including a program of actions will be developed. Fire risks to the Southern Black-Throated Finch population will be managed through the implementation of the following key components: • Identification and maintenance of fire breaks using existing fence-lines and track networks, widening fire breaks up to a width of 10 m if necessary. • Scheduled, periodic fuel management via hazard reduction burning. These will be developed and implemented in consultation with DES and Queensland Rural Fire Service with prescribed burns undertaken by suitably qualified and experienced practitioners. Management of vegetation will be generally consistent with guidelines for the local regional ecosystem, with prescribed post-wet (May – June) burns at low intensity at intervals of between 2 and 7 years, with the aim to burn no greater than 20% percent of stands in any one year. This will reduce the potential for uncontrolled high intensity fires that have the capacity to burn out habitat across the entire Offset Area. Fire management actions will be reviewed every five years, at a minimum, in consultation with local Fire Management Authorities and including the DES and Qld Rural Fire Service.			The 2021/9133 Offset Area Bushfire Management Plan (Terra Solutions, 2024) considers prescribed burn planning in line with habitat for the Southern Black-throated Finch as detailed in Section 4.4.1 of the Bushfire Management Plan. Maintenance of fire breaks is included in Section 4.6 of the 2021/9133 Offset Area Bushfire Management Plan (Terra Solutions, 2024). The prescribed burn periods generally align with the regional ecosystem guidelines which is the early dry season for north Queensland and scheduled for every 5 to 7 years. Implementation of the plan by 1 July 2025 will be assessed in the next compliance report (23 February 2025 to 23 February 2026).
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)	Refer Appendix A for OAMP Table 7.7 for relevant feral animal	Partially Compliant	This commitment is considered partially compliant as there are actions required by Condition 7E that have been completed, as well as actions that are not required to be assessed until the

Action #	Management Action / Plan Commitment	Relevant Plan Interim Milestones, Monitoring and/or Aims	Compliance Assessment	Findings including evidence and comments
	to be utilised and completed within 12 months of commencement of the action. Key priorities will be monitoring and management of cats, rabbits, wild dogs, and pigs. Annual pest monitoring by a suitably qualified pest management contractor, with evidence of pest animals GPS sightings recorded. Where there is evidence of pest animals, targeted trapping, baiting and/or shooting programs will be implemented by an independent suitably qualified pest management contractor. Where annual monitoring does not identify any feral or pest species monitoring will be reduced to two yearly. Where practical and appropriate, participate cooperatively in pest management planning and implementation with local land managers (government departments, local governments, and utility providers) to ensure effective pest management in the locality of the Offset Area. As discussed in Management Action 4 (water source management), permanent water sources will be provided within LRSA. The permanent water source will consist of a bore and windmill and water trough mounted on extended legs, with suitable perches. The trough mounted on extended legs will prevent predation by cats and will prevent other feral animals from utilising the water source.	management monitoring frequency and methodology.		subsequent 12-month reporting period (23 February 2025 to 23 February 2026). Baseline pest monitoring was conducted between April and July 2024 and development of a property-wide feral animal management program was finalised on the 29 August 2024 which aligns with Condition 7F. The 2021/9133 Offset Area Pest Animal Management Plan (Kleinfelder, 2024) details several annual survey and control techniques, as well as timeframes. Priorities are provided for feral pigs and wild dogs, with monitoring of feral cats and rabbits detailed. The year 1 survey after the baseline survey required in Table 7.7 of the OAMP will be assessed in the next compliance report (23 February 2025 to 23 February 2026), as the 2021/9133 Offset Area Pest Animal Management Plan (Kleinfelder, 2024) recommends the survey be conducted between March and May of each year if it will coincide with the required annual control event. Implementation from date of the varied approval (12 March 2025) will be assessed in the next compliance report (23 February 2025 to 23 February 2026).
7	*Reduction in cattle densities* 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. Areas with high localised grazing impacts will be rehabilitated to re-establish native food grasses for the Southern Black-Throated Finch, and reinstatement of the native ground layer will require a holistic management combining management of weeds, fire, and existing pasture grasses.	Not applicable	Compliant	Townsville City Council have ownership of the land within the Offset Area and removed stock entirely from site. No graziers have any agistment agreements for land within the Offset Area.

4 NEW ENVIRONMENTAL RISKS

No new environmental risks have been identified within the current reporting period (23 January 2024 to 23 January 2025) 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 Sheathtail Bat
    - Eastern Osprey
    - Short-beaked Echidna
    - Colonial breeding bats (several species).

5 CORRECTIVE ACTIONS SUMMARY

Table 4: Corrective Actions Summary for Non-Compliance

Condition Commitment	Summary and Recommended Corrective Actions	Potential Impacts	Recommended Timeframe
1. The approval holder must not **clear** outside the **Project Area**	As shown in **Appendix B**, approximately 0.41ha at the southern end of the HPS2 project alignment has been disturbed outside of the currently approved *project area.* This 0.41ha is included as part of the amended *project area* submitted in the minor change application which is still being assessed. The recommended correct actions are to not clear outside of the currently approved *project area* and to continue to progress the minor change application to allow future clearing works to be compliant with an amended *project area,* if approved.	Non-compliance with this condition in the next 12-month reporting period. Potential impact to MNES through clearing outside of approved and previously assessed areas.	Throughout the remaining period of clearing / disturbance.

6 OBSERVATIONS

The following conditions or plan commitments have been provided in Table 5 with recommendations and timeframes that will require assessment for compliance in the next 12-month reporting period (23 February 2025 to 23 February 2026). These recommendations will act as a schedule of actions for Townsville City Council.

Table 5: Recommendations for Condition Actions Required in the next 12-month Reporting Period

Condition / Plan Commitment	Recommendations	Recommended Timeframe
7B. 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.	Implementation of the 2021/9133 EPBC Offset Area Weed Management Plan from date of the varied approval (12 March 2025).	Ensure implementation has occurred by 12 March 2025 and provide evidence that the 2021/9133 EPBC Offset Area Weed Management Plan commenced implementation from 12 March 2025.
7C. 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.	Commencement of the plan by 1 May 2025.	Ensure implementation has occurred by 1 May 2025 and provide evidence that the 2021/9133 EPBC Offset Area Revegetation and Rehabilitation Management Plan commenced implementation from 1 May 2025.
7D. The approval holder must complete installation of a permanent water source in the **offset area**, as specified in the **OAMP**, by 30 June 2025.	Installation of the permanent water source by 30 June 2025.	Ensure installation of the permanent water source by 30 June 2025.
7E. 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.	Implementation of the plan by 1 July 2025.	Ensure implementation has occurred by 1 July 2025 and provide evidence that the 2021/9133 EPBC Offset Area Bushfire Management Plan commenced implementation from 1 July 2025.
7F. 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.	Implementation of the 2021/9133 EPBC Offset Area Pest Animal Management Plan from date of the varied approval (12 March 2025).	Ensure implementation has occurred by 12 March 2025 and provide evidence that the 2021/9133 EPBC Offset Area Pest Animal Management Plan commenced implementation from 12 March 2025.

Condition / Plan Commitment	Recommendations	Recommended Timeframe
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**.	Monitoring data, surveys, maps, other spatial data and all species occurrence records data specified above, collected as part of this 12-month reporting period, is required to be submitted electronically to the Department by TCC. Submission of data collected as part of this 12-month reporting period will be listed as a Corrective Action to monitor data submission and allow compliance assessment in next 12-month reporting period (23 February 2025 and 23 February 2026).	Provide monitoring data relevant to this 12-month annual compliance report (23 February 2024 to 23 February 2025) and in accordance with the plans relevant to this approval to the department.

APPENDIX A OAMP MANAGEMENT ACTION MILESTONES AND MONITORING DETAILS

Table 7.3 Proposed management and mitigation measures for the relevant MNES

Justification	Proposed action
Management Action 1 – Legally securing offset area	
It is proposed to use a voluntary declaration (VDec) to secure the offset area. A VDec is an option under the VM Act that provides a simplified, streamlined process for landholders to voluntarily protect areas of native vegetation not otherwise protected by the VM Act. A VDec can be used to protect areas of high nature conservation values (or areas vulnerable to land degradation), and to secure areas of land to satisfy statutory offset requirements.	The proponent will follow the process outlined in the Guide to Voluntary Declarations under the VM Act (effective 21 June 2019) to obtain the VDec, which is summarised below. A Request for a voluntary declaration application is submitted to the Queensland Department of Resources (DoR), including written consent from all registered owners, a description of the purpose of the VDec and how the area meets the criteria of high nature conservation value, and a copy of the offset area management plan. The DoR will assess the VDec request to ensure it meets all criteria required and to ensure the management plan contains the appropriate elements to ensure the declared area is managed to achieve the desired outcomes. Once the DoR is satisfied that the VDec request meets the criteria for a declaration, a VDec offer will be sent that includes a draft: – Declaration notice. – Declared area code (if proposed). – Property Map of Assessable Vegetation (PMAV) showing the area as Category A vegetation, giving it a high level of protection similar to endangered regional ecosystems within a Category B area. – Declared area management plan, including map of the declared area. After the DoR and the proponent agree to the offer, DoR will make the declaration and provide a finalised VDec package. The declaration takes effect from the date the chief executive signs the declaration notice. The offset area management plan has effect under the VDec process from the same date. The VDec will be applied over the offset areas in perpetuity. There are no statutory timeframes for the VDec application and approval process.
Management Action 2 - Revegetation and regeneration management	
Southern black-throated finch Southern black-throated finch habitat is broadly defined as grassy open woodlands and forests, typically dominated by *Eucalyptus, Acacia* and *Melaleuca*, especially on alluvium (river and creek flats). Nests are generally constructed in open areas with a low species diversity, a sparse shrub layer and low tree abundance. Nests are commonly constructed on a horizontal fork or within the twiggy branches of *Eucalyptus* spp., and occasionally in a hollow limb of a tree, termite mound, among grass, in old babbler nests and at the base of raptor nests (Higgins et al. 2006). In two heavily studied areas on the Townsville Coastal Plain, southern black-throated finch preferred *E. platyphylla* and *Melaleuca* spp., for nesting purposes (Rechetelo 2015).	Within 6 months of Project approval by DCCEEW, revegetation will commence within nominated areas. The rehabilitation program will be undertaken by a suitably qualified bush regeneration contractor and will include measures to ensure the maintenance and survival of new nesting (southern black-throated finch) and roosting (bare-rumped sheathtail bat) trees in the offset areas. Within mapped regrowth areas, natural regeneration is preferred to the reconstruction of the vegetation community (i.e. soil improvements, dense planting etc). Management of these areas will focus on controlling weeds and restricting access from vehicles or stock animals, or other existing significant disturbances, in order to promote further growth

Justification	Proposed action
The Project is anticipated to result in the loss of 96.34 ha (in aggregate) of potential habitat critical to the survival of the species. This comprises 82.14 ha of nesting and foraging habitat 82.14 ha and 14.19 ha of foraging only habitat 14.19 ha. The proposed offset area is subject to disturbance including some historical clearing (NRA 2011). Clearing and fragmentation of woodland is listed in the Significant Impact Guidelines as a major threat. Rehabilitation and revegetation is a key action that will improve BTF habitat values within the offset area, while also expanding habitat values in areas that have been subject to weed infestations. Rehabilitation aims to reinstate existing degraded areas and areas exposed as a result of management action 3 (weed management), with southern black-throated finch nesting trees consistent with the mapped regional ecosystem. The proposed offset area has been chosen as it contains remnant and regrowth *E. playphylla* woodland (nesting habitat) and non-remnant vegetation (foraging habitat). The active revegetation (including the planting of tubestock) of non-remnant areas within the offset area has the potential to increase population by increasing the availability of nesting sites, and seeding the ground layer with native food grass species for the southern black-throated finch will increase the quality and abundance of food resources.	and new seedlings. Where natural regeneration is unsuccessful minor infill planting will be implemented to facilitate recovery. A planting program will be designed for areas where disturbances occur within the offset sites (e.g. non-remnant). The species selected will be site-specific and dependent on localised habitat features and landforms and consistent with the mapped regional ecosystem or pre-clear regional ecosystem over the area, with key focus also on providing native grass food species for the southern black-throated finch. A monitoring and maintenance schedule will be implemented to provide adequate watering, weed control and replacement of tubestock or re-seeding, as necessary.
Koala The koala has a specialist diet, feeding on the leaves of select species of *Eucalyptus, Lophostemon, Corymbia, Angophora* and occasionally *Melaleuca* and *Leptospermum* (Martin and Handasyde 1999; Moore and Foley 2000). Consequently, koalas are reliant on access to stands of forest and woodland that support those key food-tree species. Shelter (non-food) tree species are also used to rest and assist in thermoregulation (Crowther et al. 2013; Briscoe et al. 2015). The Project is anticipated to result in loss of 134.2 ha of habitat that constitutes habitat critical to the survival of the species, comprising 74.33 ha of forest or woodland and 48.25 ha of non-remnant (e.g. road-side, paddock trees) vegetation. Rehabilitation and revegetation is a key action that will improve koala habitat values within the offset area. Specifically, reinstating the natural RE communities has the potential to increase habitat connectivity and increase the availability of key resources including food and shelter trees for the koala.	
Bare-rump sheathtail bat The Commonwealth listing advice identifies habitat as including mostly in lowland areas, typically in a range of woodland, forest and open environments (Schulz and Thomson 2007; Reardon et al. 2010; Dennis 2012). In north Queensland, the species occurs in lowland open woodland areas dominated by *Eucalyptus platyphylla* (poplar gum) (Compton and Johnson 1983). The species has been recorded using large, deep hollows for roosting and breeding in species *E. platyphylla, E. miniata*, *E. tetrodonta* and *Melaleuca leucadendra* (TSSC 2016). Information on the dimensions of known roosting hollows is presented in the	

Justification	Proposed action
National Recovery Plan for the bare-rumped sheathtail bat (Schulz and Thomson 2007) and Australian bats (Churchill 1998), with all hollows ranging in size between 18 cm and 29 cm diameter. There are only two records in the last two decades, both from north-eastern Queensland (DAWE 2022A). The Project is anticipated to result in the following impact to bare-rumped sheathtail bat habitat: – Loss of 92.23 ha (in aggregate), comprising: • Foraging and roosting habitat 36.44 ha • Foraging only habitat 49.11 ha • Roosting only habitat 6.68 ha – Direct loss of 10 large hollow-bearing trees and 27 moderate *E. platyphylla* hollow-bearing trees which represent potential roosting habitat for the bare-rumped sheathtail bat. – The loss of 325 small hollow-bearing *E. platyphylla* trees represents a loss of future potential roosting trees for the species. Small hollows with narrow entrances take approximately 100 years to form. Hollows of a medium size will take around 200 years to form, and larger and deeper hollows can take a lot longer (Mackowski 1984; Menkorst 1984; and Scotts 1991). Vegetation clearing is listed as a major threat in the Conservation Advice for bare-rumped sheathtail bat. Rehabilitation and revegetation is a key action that will improve bare-rumped sheathtail bat habitat values within the offset area, while also expanding habitat values in areas that have been subject to weed infestations. Rehabilitation aims to reinstate existing degraded areas and areas exposed as a result of management action 3 (weed management), with future roosting trees consistent with the mapped regional ecosystem. The proposed offset area has been chosen as it contains remnant *E. playphylla* woodland which contains roosting habitat (moderate to large hollows). The area also contains regrowth *E. platyphylla* representing future roosting habitat and non-remnant vegetation (foraging habitat). The active revegetation (including the planting of tubestock) of non-remnant areas within the offset area has the potential to increase population by increasing the availability of roosting sites.	
Management Action 3 - Weed management	
The vegetation communities understorey within the offset area were observed to be in an altered condition due to weed infestation. Many parts of the site contain a mid-dense to dense shrub layer of chinee apple *(Ziziphus maurtiana)* (listed under the *Biosecurity Act 2014*). Under normal conditions these communities would have a grassy woodland to open woodland structure suitable for a range of granivorous birds. These species commonly forage on grass seeds in open areas; however, the closure of the understorey has substantially reduced this habitat from both a structural	Weed management measures will be implemented within 6 months of Project approval by DCCEEW and an ongoing weed control program will commence. Methods for weed control will be site-specific and appropriate to each species, with regard to best practice and relevant guidelines, such as: – Townsville City Biosecurity Plan 2020 – 2024. – Biosecurity Queensland fact sheets. Treatment options should be undertaken using an integrated approach. Methods may involve a combination of physical, chemical and/or biological methods, depending on the

Justification	Proposed action
perspective and through competition with the native grass food source. Southern black-throated finch tend to avoid sites with high shrub cover and abundance, particular chinee apple *(Ziziphus maurtiana)*, lantana *(Lantana camara)* and Townsville wattle (*Acacia leptostachya*) (Rechetelo 2015). Chinee apple also limits the application of fire as a management tool leading to vegetation thickening, which also alters the vegetation community structure. The closure of the understorey also suppresses the recruitment of native canopy species. Stylosanthes* (an introduced pasture legume) was also common within the ground layer strata, whereby potentially suppressing southern black-throated finch foraging grasses. Fire management has been recommended to maintain the balance between Stylosanthes* and palatable grass species in improved pastures (Partridge et al. 1996). Fire management is further discussed below. The field investigations identified the following weed species that are likely to lead to the degradation of southern black-throated finch habitat: **Woody weeds** – Chinee apple *(Ziziphus maurtiana)* – Lantana *(Lantana camara)* – Townsville wattle (*Acacia leptostachya*) – Rubber vine *(Cryptostegia grandiflora)* – Parkinsonia (*Parkinsonia aculeata*) – Prickly Acacia *(Vachellia nilotica;* syn. *Acacia nilotica)* – Siam Weed *(Chromolaena odorata).* **Exotic forbs** – Snakeweed *(Stachytarpheta jamaicensis)* – Stylosanthes spp.Bellyache bush (*Jatropha gossypiifolia*) – Horehound *(Mesosphaerum (*syn. *Hyptis) suaveolens)* – Sidas (mostly *Sida acuta)* – Broad-leaf Tea-tree – Quinine *(Petalostigma pubescens).* **Exotic grasses** – Sheda Grass *(Dichanthium annulatum)* – Parra Grass *(Urochloa mutica)* – Guniea Grass (*Megathyrsus maximus*) – Rhodes Grass *(Chloris gayanaa)* – Grader Grass *(Themeda quadrivalis).* Invasion of habitat by exotic weed species, including exotic grasses is listed in the National Recovery Plan as a major threat and the Habitat Management Guidelines (NRA 2011) recommend the control of lantana* and chinee apple*.	species and extent of infestations. Fire management as discussed below should also form part of the overall integrated approach. Some species may require subsequent treatments due to viability of seed banks for longer periods. Prior to any use of mechanical clearing, proposed treatment sites should be examined, and desirable trees and regrowth clearly marked with pink flagging tape to help reduce native vegetation. Appropriate minor use permits from the Commonwealth Australian Pesticides and Veterinary Medicines Authority may apply.

Justification	Proposed action
To improve habitat value the removal and control of chinee apple and other invasive weeds is required to return the vegetation community to an open woodland structure with a sparse shrub stratum as recommended by NRA (2011).	
Management Action 4 - Water source management	
The provision of drinking sites will enhance the value of habitats for the southern black-throated finch and help reduce the impact of drought on the koala. Habitat critical to the survival of the species has not been formally defined in the National Recovery Plan for the southern black-throated finch (Black-throated finch Recovery Team 2007) or the Referral guidelines for the Black-throated finch (southern) (DEWHA 2009). Habitat critical to the survival of the species is likely to include nesting habitat. In the Townsville region the southern black-throated finch typically nests within 400 m of a water source and is rarely seen more than 1 km from permanent water during the breeding season (NRA 2006). Nesting sites also need to be near foraging habitat as observations suggest that during the breeding season the subspecies travels smaller distances than it does during the dry season (Mitchell 1996; NRA 2006; NRA 2007). The presence of suitable trees close to seasonal water sources is critical for the southern black-throated finch. Performance indicators for water supply detailed in the habitat management guidelines (NRA 2011) include: – Southern black-throated finch using water sources. – Water sources are located within 200 m of and not more than 400 m from foraging habitat and near woody vegetation. Compromised water sources due to drought and intense grazing regimes is listed in the Significant Impact Guidelines as a major threat. A permanent water source which contains water during an average wet season is located on the lower reaches of Landsdowne Creek, located greater than 700 m to the north-east of the offset area eastern extent. A section of Landsdowne Creek is located within the offset site (21 on E124186 and 2 on RP725617) and flows parallel to its eastern boundary. Within this reach Lansdowne Creek is considered semi-permanent. There are a number of farm dams located to the south of the offset area's southern extent which are considered permanent, the closest being within 200 m. Although one permanent dam is located within 400 m from the proposed offset area's south-eastern extent (Figure 2.3), due to the size of the proposed offset area, the lack of permanent water sources may restrict southern black-throated finch utilisation of the area. NRA (2011) suggests that water sources can be used to manipulate the distribution of southern black-throated finch within the landscape, in which species have been known to drink from artificial water sources (e.g. cattle troughs) if suitable perches are available. The installation of artificial permanent water points are proposed to ensure the distribution of southern black-throated finch is not restricted within the offset area.	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). Feral cats have been observed ambushing birds, including finches, at cattle troughs (NRA 2011). The permanent water source will consist of a windmill and water trough mounted on extended legs, with suitable perches. The provision of artificial permanent water sources will ensure that a water source is accessible within 400 m from any location within the offset area.

Justification	Proposed action
Management Action 5 - Fire management	
Inappropriate fire regimes that lead to infrequent hot dry fires threaten roost resource availability for the bare-rumped sheathtail bat and increase the risk of uncontrolled wildfires that are a threat to the koala, bare-rumped sheathtail bat and southern black-throated finch. NRA (2018) suggested that historical fire regimes on LRSA are likely to be unfavourable for southern black-throated finch. The historical fire regime has probably contributed to the proliferation of certain weedy grasses and forbs that are unfavourable for southern black-throated finch (NRA 2018). The National Recovery Plan has identified the alteration of habitat by changes in fire regime as a major threat to southern black-throated finch. Fire has been infrequent in the south of the LRSA (0 to 1 fire since 2000). In other areas of the LRSA fire has been more frequent, whereby predominantly occurring during periods of relatively low rainfall and warm or hot weather (NRA 2018). Fires that occur at times of low soil moisture disadvantage native grasses and favour forbs (NRA 2018). Additionally, hot fires coinciding with these conditions can result in temporary broad-scale loss of plant biomass, thereby creating conditions favourable for weed ingress and homogenising grass flowering/seeding timeframes (NRA 2018). When repeated over the medium to long term, these conditions will likely disadvantage southern black-throated finch (NRA 2018). Stylosanthes* (an introduced pasture legume) which was commonly observed within the ground layer of the offset area, can out compete potential southern black-throated finch foraging grasses. Fire has been recommended to maintain the balance between Stylosanthes* and palatable grass species in improved pastures (Partridge et al. 1996). Consideration should also be given to where grader grass* and thatch grass* is present. Both species can expand rapidly in response to ground disturbance caused by fire (NRA 2018). Management should aim to prevent extensive and uncontrolled fires. This is especially an issue in areas that have high fuel loads, such as lands not grazed by cattle (NRA 2011). Recommendations for managing southern black-throated finch habitats with fire are listed in the Habitat Management Guidelines (NRA 2011) and include: – Maintain landscapes that have variety in burning regimes, e.g. variety in the timing and intensity of fires and the areas burnt each year. This can be achieved by adopting a fire regime that involves burning fire breaks earlier in the season then following up with early dry season (May to July) patch burns (cool burns) in discrete areas (i.e. don't burn entire landscapes at once). Areas should be left unburnt for 5 or more years apart from fire breaks which may require more frequent treatment. – Southern black-throated finch will most likely benefit from landscapes that have a mosaic of fire histories (spatially and temporally).	Within 12 months of Project approval, a Bushfire Management Plan will be developed and implemented. A review of historical fire management efforts and fire history will be undertaken for the proposed offset areas and surrounds. Fire management actions will be planned and implemented with the aim of protecting the offset area and southern black-throated finch habitat values and resources. The Queensland Herbarium (2021b) provides fire management guidelines for each of the Queensland Regional Ecosystems that occur within the offset area and are described in Table 7.4. Although the Queensland Herbarium (2021b) guidelines are developed for the general maintenance of a regional ecosystem and needs to be considered, they are not tailored to promote and maintain suitable foraging grasses for southern black-throated finch. Fire management should therefore aim to meet the Habitat Management Guidelines (NRA 2011) performance indicators for managing fire for southern black-throated finch habitat. A fire management strategy including a program of actions will be developed. Fire risks to the southern black-throated finch population will be managed through the implementation of the following key components: – Identification and maintenance of fire breaks using existing fence-lines and track networks, widening fire breaks up to a width of 10 m if necessary. – Scheduled, periodic fuel management via hazard reduction burning. These will be developed and implemented in consultation with DES and Queensland Rural Fire Service with prescribed burns undertaken by suitably qualified and experienced practitioners. Management of vegetation will be generally consistent with guidelines for the local regional ecosystem, with prescribed post wet (May – June) burns at low intensity at intervals of between 2 and 7 years, with the aim to burn at no greater than 20% percent of stands in any one year. This will reduce the potential for uncontrolled high intensity fires that have the capacity to burn out habitat across the entire offset area. Fire management actions will be reviewed every five years, at a minimum, in consultation with local Fire Management Authorities and including the DES and Qld Rural Fire Service.

Justification	Proposed action
– Protect dry season southern black-throated finch habitat, especially grasslands near to water, from late dry season fires. This is particularly important during dry years. Also protect grasslands near water sources during the southern black-throated finch breeding season when there is no alternative water or habitat nearby. – Burn when there is good soil moisture. Spell grasslands after fire to reduce woody vegetation thickening and assist in the recovery of native perennial grasses. – Wet season fires (January to March) should be avoided due to impacts on Cockatoo grass. – A fire regime recommended by the Queensland Herbarium (2021b) for REs 11.3.12, 11.3.25 and 11.3.35 is suitable for most southern black-throated finch habitats on LRSA. Igniting fires under appropriate weather conditions is essential for achieving these outcomes.	
Management Action 6 – Control of feral animals	
The National Recovery Plan has identified following as major threats to southern black-throated finch: – Degradation of habitat by domestic stock and rabbits, including alterations to fuel load, vegetation structure and wet season food availability. – Predation by introduced predators. Feral animals that pose a threat to southern black-throated finch include feral pigs *(Sus scrofa),* feral rabbits/hares *(Oryctolagus cuniculus / Lepus europaneus)* and feral cats *(Felis catus)* (NRA 2018). The feral animal species feral pigs* (*Sus scrofa*) and wild dogs (*Canis familiaris*) are considered common within the LSRA, where feral pigs* have a potential material impact on southern black-throated finch's habitat. While rabbits (*Oryctolagus cuniculus*) are considered uncommon within the LSRA (NRA 2018; Pers comm. Bradley Drinkwater (Ross River Dam Ranger)), the species can substantially degrade habitat for the southern black-throated finch and may degrade the quality of habitats at the offset area if left unchecked. Each year TCC conduct an aerial shooting program where they control approximately 30 wild dogs* and 220 wild pigs* per year (Pers comm. Bradley Drinkwater (Ross River Dam Ranger)). Southern black-throated finch require viable habitat which is made up of seeding grasses available all year round, in order to sufficiently support life, recruitment and genetic diversity (NRA 2018). Feral pigs can reduce of seedling grasses, such as Cockatoo Grass *(Alloteropis semialata),* essential for southern black-throated finch and act as vector for the spreading and establishment of weed species. Feral pigs are known to remove Cockatoo Grass by digging up the plants to feed on the tubers (NRA 2011), thereby reducing the abundance of resources for southern black-throated finch. Feral cats also pose a threat to southern black-throated finch when drinking, where they have been observed attacking birds including finches at cattle troughs (NRA	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. Annual pest monitoring by a suitably qualified pest management contractor, with evidence of pest animals GPS recorded. Where there is evidence of pest animals, targeted trapping, baiting and/or shooting programs will be implemented by an independent suitably qualified pest management contractor. Where annual monitoring does not identify any feral or pest species monitoring will be reduced to 2 yearly. Where practical and appropriate, participate cooperatively in pest management planning and implementation with local land managers (government departments, local governments and utility providers) to ensure effective pest management in the locality of the offset area. As discussed in Management Action 4 (water source management), permanent water sources will be provided within LRSA. The permanent water source will consist of a bore and windmill and water trough mounted on extended legs, with suitable perches. The trough mounted on extended legs will prevent predation by cats and will prevent other feral animals from utilising the water source.

Justification	Proposed action
2011). Predators, such as feral cats, may occur in higher numbers in areas closer to water sources (Landsberg et al. 1997). Feral animals including the wild dog are common in the proposed offset area and have the potential to impose negative pressures on the koala, with dogs representing a key mortality threat to koalas (DAWE 2022A).	
Management Action 7 – Reduction in cattle densities	
The offset area has been subject to varying levels of cattle grazing. This has degraded understorey vegetation, with reduced extent and quality of foraging habitat for the southern black-throated finch within the offset area particularly notable. Reduction of cattle densities and reinstatement of native grassy ground layer will increase food availability for the southern black-throated finch.	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. Areas with high localised grazing impacts will be rehabilitated to re-establish native food grasses for the southern black-throated finch, and reinstatement of the native ground layer will require a holistic management combining management of weeds, fire and existing pasture grasses.

Fire management guidelines for each of the REs that occur within the offset area and are described in Table 7.4.

Table 7.4 Queensland Herbarium (2021b) fire management guidelines for each of the Queensland Regional Ecosystems in the offset area

RE code	Short description	DES Fire Management Guidelines
11.3.12	*Melaleuca viridiflora, M. argentea +/- M. dealbata* woodland on alluvial plains	SEASON: Mid-dry season. INTENSITY: Low to moderate. INTERVAL: Occasional fires, typically every 5 - 10 years. STRATEGY: Use occasional burning to promote herbs and shrubs and reduce excessive fuel build up that can cause high intensity fires. ISSUES: The coastal north Queensland populations of *Grevillea pteridifolia* are fire-killed obligate seeders with fire promoted germination. Many herbs are promoted by fire, such as ground orchids. Conversely, terrestrial orchids can be killed by fires that are intense enough to scorch them in the canopy and therefore they provide a useful indicator of past fire intensities. Ensure maintenance of a diverse ground and shrub layer. Where *Grevillea pteridifolia* or other fire-killed shrubs are present, wait until subsequent post-fire seedlings have matured before burning again.
11.3.25b	*Melaleuca leucadendra* and/or *M. fluviatilis, Nauclea orientalis* open forest	SEASON: Primarily early dry season. INTENSITY: Low. INTERVAL: 3 - 5 years. STRATEGY: Protection relies on broad-scale management of surrounding country with numerous small fires throughout the year so that wildfires will be very limited in extent. c-g: Depending on position in the landscape, protection depends on broad-scale management of surrounding country, with numerous small fires throughout the year so that wildfires will be very limited in extent. ISSUES: Fringing communities are critical habitat. In some situations it may be best not to burn. Intense and extensive fires degrade vegetation structure and destroy fauna habitats. Restrict the extent and intensity of fires. Hollow trees are critical habitat. Green panic may be an issue and an intensive grazing regime for very short periods, may be necessary to limit potential of wildfire. If riparian areas need to be burnt to reduce fuel loads then burning should occur when there is good soil moisture and active growth.
11.3.35	*Eucalyptus platyphylla*, *Corymbia clarksoniana* woodland on alluvial plains	SEASON: Early dry season when there is good soil moisture, with some later fires in the early storm season or after good spring rains. INTENSITY: Primarily low to moderate, with occasional high intensity fires. INTERVAL: Typically 2 - 7 years, with some areas longer unburnt. STRATEGY: A predominance of early dry season fires is recommended, although there is value in occasional late dry season fires, or storm burns, over small areas. Burning should begin very soon after the wet season, to secure boundaries and adjacent fire-sensitive vegetation. Subsequent repeat ignitions can be used within the same section of land weeks or months after the boundaries have been secured by early burning, to produce a mixture of burnt areas with multiple ignition dates. Use topographical features to ignite areas as soon as they dry out. This will create a mosaic of areas that were burnt at different dates and unburnt sections within the same area of woodland. Burn away from riparian communities, which can be critical habitat for some species. Approximately 25% of the grassy woodlands within a landscape should receive patchy fires in most years. ISSUES: These woodlands have a diverse native grass and herb layer that is maintained and promoted by regular fire. Burning that starts immediately after the wet season, with follow up small fires ignited progressively over multiple dates can increase the availability of grass and herb seed, which is a critical food source for many birds and small mammals. Recently burnt grass clumps tend to produce more seed than unburnt clumps and the earlier burnt grass usually seeds earlier than later burnt grass. Maintaining a fire mosaic will help ensure protection of habitat and mitigate against wildfires. Low to moderate intensity burns with good soil moisture minimise the risk of losing hollow trees. An occasional late season burn will promote grasses and legumes. Ensure a diverse grass layer; maintain hollow-bearing trees and vegetation structure.

7.3 Completion criteria and corrective actions

Completion criteria have been derived from the site habitat quality to demonstrate the improvement in the quality of habitat in the offset area over a 20-year period (Table 7.6). These have been broadly categorised to align with the ecological outcomes detailed in Section 6.4 herein. Additionally, interim milestones that set targets at 5-yearly intervals for progress towards achieving these offset completion criteria have been developed (Table 7.6).

Monitoring results will be used to determine if the interim milestones are being achieved. These interim milestones provide an indication of the success of the management measures being implemented for southern black-throated finch, bare-rumped sheathtail bat and koala habitat and serve as trigger values where failure to achieve these will result in the implementation of corrective actions. Accordingly, corrective actions are detailed in Table 7.5.

Table 7.5 Interim milestones, completion criteria and corrective actions

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.	– At least 90 percent survival of planted tubestock is observed. – At least 70 percent germination of seeds is observed. – Natural regeneration of key flora species from all vegetation strata is observed in regrowth areas.	– Regeneration and establishment of native plant communities is recorded. – No notable areas of dieback are recorded. – Net increase in canopy cover is recorded. – Increase in habitat scores is recorded as per 5 year milestones in Table 7.6.	– Net increase in canopy cover is maintained. – Recruitment and regeneration of native plants is maintained. – Increase in habitat condition scores is recorded as per 10 year milestones in Table 7.6 .	– Net increase in canopy cover is maintained. – Recruitment and regeneration of native plants is maintained. – Increase in habitat condition scores is recorded as per 15 year milestones in Table 7.6.	– Restore the RE vegetation across non-remnant and regrowth areas to achieve floristics comparable to that of the relevant RE benchmarks. – Achieve required point increase in habitat condition scores.	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.	– At least 90 percent survival of planted tubestock is recorded.	– Net increase in canopy and shrub species diversity is recorded.	– Net increase in canopy and shrub species diversity is maintained.	– Maintain the net increase in canopy and shrub species diversity	– Species richness of canopy layer meets or exceeds RE benchmark.	Active planting of tubestock.
Increase the cover and diversity of native grass species for southern black-throated finch.	– At least 70 percent germination of seeds is observed.	– Net increase in cover and diversity of target native grass is recorded.	– Net increase in cover and diversity of target native grass is maintained.	– Net increase in cover and diversity of target native grass is maintained.	– Diversity and cover of native grasses is comparable to that of the relevant RE benchmarks.	Seeding with southern black-throated finch food species.
Reduce weed density	– Program for weed management has been developed and commenced to reduce the presence of weeds.	Weed management has reduced the density and extent of existing weed infestations. – No new weed infestations have established.	– No net increase in weed cover is recorded.	– No net increase in weed cover is recorded.	– Density and extent of shrubby weeds and grassy weeds within the offset area reduced to 70% of baseline level.	Review and update the weed management program, and implement necessary actions.
Provide artificial permanent water sources	– Establish artificial permanent water source.	– Quality and functionality of artificial permanent water	– Quality and functionality of artificial permanent water	– Quality and functionality of artificial permanent water	– Artificial permanent water source provides suitable quality	Repair or modify artificial water source.

Ecological outcome	Year 1 performance indicator	Year 5 performance indicator	Year 10 performance indicator	Year 15 performance indicator	Completion criteria	Corrective actions
		source is maintained.	source is maintained.	source is maintained.	and quantity of water.	
No uncontrolled bushfires that burn more than 50% of the offset area	– A fire management strategy has been developed for the offset area and commenced.	– No uncontrolled bushfires that burn more than 50% of the offset area have occurred.	– No uncontrolled bushfires that burn more than 50% of the offset area have occurred.	– No uncontrolled bushfires that burn more than 50% of the offset area have occurred.	– No uncontrolled bushfires that burn more than 50% of the offset area have occurred.	Review Bushfire Management Plan and implement necessary actions.
Reduce feral animal density (pigs and dogs)	– Program for the control of feral animals has been developed and commenced to reduce the presence of pigs and dogs.	– Feral animal density is lower than that of the baseline. – No areas of notable habitat damage by feral animals are recorded.	– No net increase in feral animal density is recorded. – No areas of notable habitat damage by feral animals are recorded.	– No net increase in feral animal density is recorded. – No areas of notable habitat damage by feral animals are recorded.	– Feral animal densities have been reduced to prevent the degradation of habitat by pigs and prevent koala injury by dogs.	Review and update the feral animal management program, and implement necessary actions.

Table 7.6 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)
Bare-rumped sheathtail bat					
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
Total	5.75	6.19	6.63	7.06	7.50
Southern black-throated finch					
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
Total	5.05	5.41	5.78	6.14	6.50
Koala					
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
Total	4.41	4.73	5.04	5.36	5.67

7.4 Monitoring commitments

Monitoring will be undertaken to evaluate the effectiveness of management actions and assess whether interim milestones are being met. Proposed monitoring is detailed in Table 7.7, including the frequency and method of monitoring for each aspect.

Table 7.7 Monitoring commitments

Monitoring aspect	Monitoring frequency	Method
Baseline survey event	The condition surveys that have been undertaken to inform preparation of this OAMP will form the baseline data.	N/A
Revegetation	– Weekly during the establishment phase (typically 12 weeks). – Every 3 months for the first year after initial revegetation, then every six months in years 2 and 3 after initial treatment.	– Assess plant health and mortality.

Monitoring aspect	Monitoring frequency	Method
Weed infestations	– Every 3 months for the first year after initial treatment, then every six months in years 2 and 3 after initial treatment. – Scheduled inspection and follow-up treatments once in years 4 and 5 after initial treatment.	– Assess density and extent of weed infestations.
Habitat condition and photographs	– The condition plots will be assessed at Years 5, 10, 15 and 20 after the baseline survey. – The timing of ongoing monitoring is to correspond to that of baseline surveys.	– Condition monitoring will be undertaken at the plots assessed during baseline surveys. – Assessment within these plots will be undertaken in accordance with *Guide to Determining Terrestrial Habitat Quality* (DES 2020). – 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.
Feral animals	– Years 1, 3 and 5 after baseline survey. – Timing of ongoing monitoring to correspond to that of baseline surveys.	To be determined as part of developing the feral animal management program (e.g. ground-based camera trapping, spotlighting transects).
MNES fauna species*	– Surveys of southern black-throated finch and bare-rumped sheathtail bat to determine species usage of the offset site	In accordance with the relevant survey guidelines (DEWHA 2009a,b; DSWEPaC 2011), including: – Bare-rumped sheathtail bat: dusk roost watches, Anabat detector – Southern black-throated finch: area searches around waterbodies for nests and birds; waterbody watches; vigilant bird surveys

*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

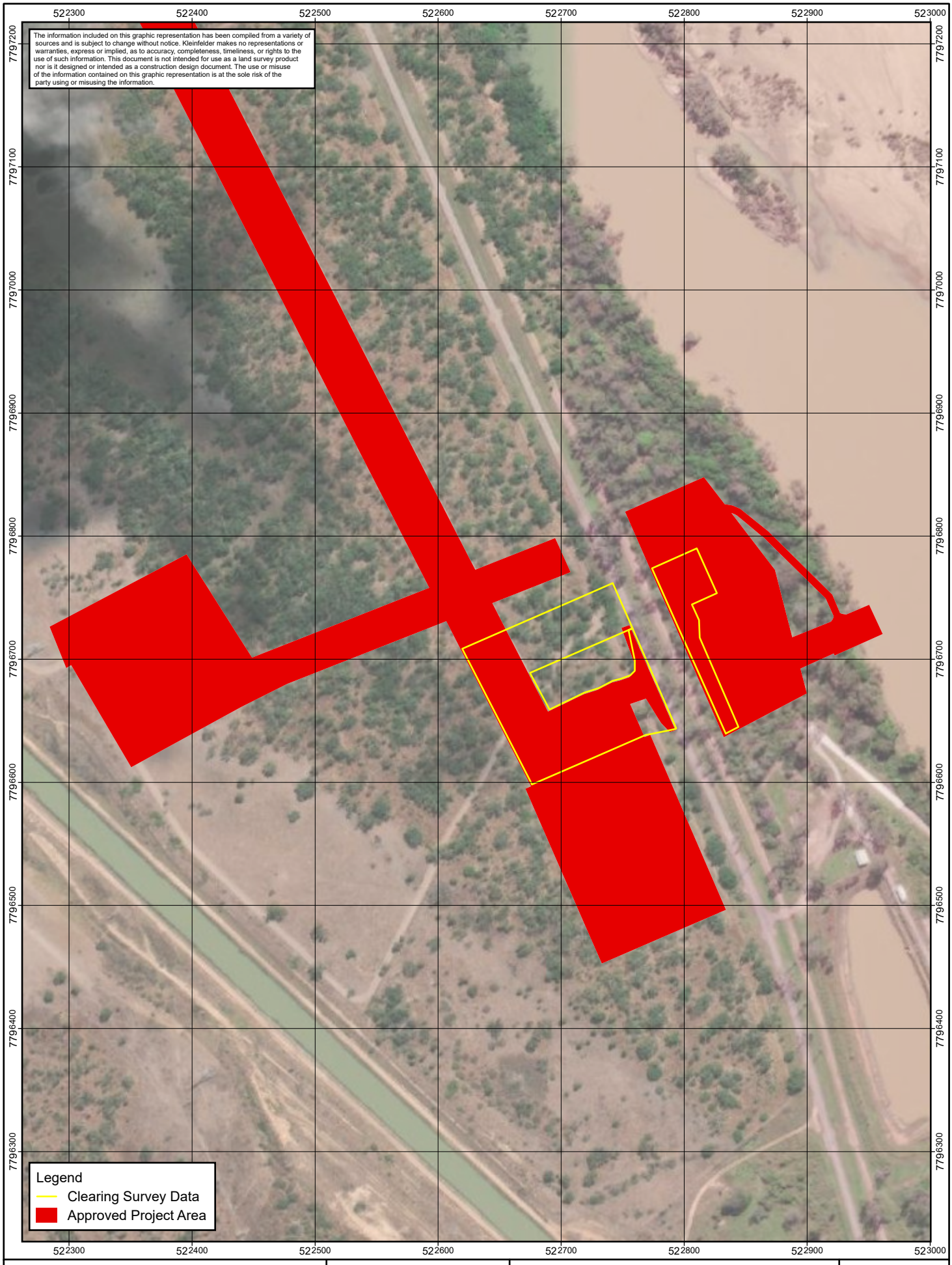
7.5 Adaptive management

An adaptive implementation program will be used to ensure uncertainty is reduced over time, and that completion criteria are attained and maintained over the period of approval. As more information becomes available following ongoing performance monitoring, the management and monitoring regime will be reviewed and revised to maximise the likelihood of attaining and maintaining the outcomes to be achieved by implementing the OAMP. Any updates to the OAMP which do not result in a material change to the environmental outcomes, performance and completion criteria will be made by TCC without the requirement of informing the DCCEEW. If material amendments likely to alter the environmental outcomes, or performance and completion criteria are proposed to the OAMP, the amendments and justification for the contingency measures will be provided to the DCCEEW in writing.

Adaptive management will be used to incorporate changes in any of the following areas:

– Assimilation of new data or information - such as, updates to conservation advice or new threat abatement plans relevant to the southern black-throated finch, bare-rumped sheathtail bat and koala.
– Project coordination and scheduling – to manage unforeseen disruptions to schedule such as inclement weather on contractor works for management actions and environmental consultant monitoring events.

APPENDIX B PROJECT AREA MAPPING DISCREPANCY



0 20 40 80 120 160 200

Scale @ A4 1:4,000 Metres

GDA 1994 MGA Zone 55

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PROJECT REFERENCE:	24005427
DATE DRAWN: 20/05/2025	Version 1
DRAWN BY:	RHourigan
DATA SOURCE: Esri - 2025	

HPS2 ANNUAL COMPLIANCE REPORT

TOWNSVILLE CITY COUNCIL
HAUGHTON PIPELINE STAGE 2
WEED MANAGEMENT PLAN
PIPELINE ALIGNMENT

FIGURE:

1

Path: J:\00 CLIENT FILES\132297_Townsville City Council\24005427_HaughtonPipelineStage2\250516_HaughtonPipeline_ClearingHabitats\250516_HaughtonPipeline_ClearingHabitat.aprx (1)