

Western Outer Ring Main EPBC Compliance Report 2024-25

January 2026



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 

Full name (please print) Lisa Dumbrell

Position (please print) General Manager Access and Approvals

Organisation (please print including ABN/ACN if applicable) APA VTS AUSTRALIA (OPERATIONS) PTY LIMITED
65 083 009 278

Date 13 / 01 / 2026

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Term	Definition
DCCEEW	Commonwealth Department of Climate Change, Energy the Environment and Water
DTP	Victorian Department of Transport and Planning
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth)
GSM	Golden Sun Moth
SLL	Striped Legless Lizard
the EPBC Approval	The Project's approval under the EPBC Act (EPBC 2019/8569)
the Project	Western Outer Ring Main
VTS	Victorian Transmission System

1. Introduction

This comprises the second annual compliance report for Approval 'EPBC 2019/8569' for the Western Outer Ring Main ('WORM') Pipeline. The Western Outer Ring Main project is a high pressure, buried, gas transmission pipeline approximately 51 kilometres in length. It addressed a key capacity constraint in the Victorian Transmission System (VTS) by providing a new high-pressure connection between existing sources of natural gas supply in the north and east with those in the west of the state. Table 1 describes the action as it pertains to the EPBC Act.

Table 1 Project Details

Project	Western Outer Ring Main (WORM)
Approval holder	APA VTS AUSTRALIA (OPERATIONS) PTY LIMITED
ABN	65 083 009 278
EPBC Approval	EPBC 2019/8569
Approved Action	To construct and operate the Western Outer Ring Main (WORM) high pressure gas transmission pipeline between Plumpton and Lindum Vale, northwest of Melbourne CBD, Victoria. See EPBC Act referral 2019/8569, subject to the variation of the action accepted by the Minister under section 156B on Wednesday, 21 April 2021, further variation of the action under s143(1)(c) of the EPBC Act on 9 th November 2023 and additional further variation accepted under s156B on 25 March 2025.
Project Location	Plumpton Meter Station to Wollert Compressor Station (please refer to Figure 1).
Reporting period	9 th November 2024 – 9 th November 2025
Report Date	6 th January 2026
Project Phase	Rehabilitation and pipeline operation

1.1. Compliance Report Purpose

The purpose of this report is to record compliance in accordance with condition 15 of the Project's EPBC Approval:

15) The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:

- a) publish each compliance report on the website within 60 business days following the relevant 12 month period*
- b) notify the Department by email that a compliance report has been published on the website and provide the weblink for the compliance report within 5 business days of the date of publication*
- c) keep all compliance reports publicly available on the website until this approval expires*
- d) exclude or redact sensitive ecological data from compliance reports published on the website*
- e) where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication. Note: Compliance reports may be published on the Department's website.*

This annual compliance report has been prepared in accordance with the *Annual Compliance Report Guidelines, Reporting under the Environment Protection and Biodiversity Conservation Act, 1999 (DCCEEW, 2023)*.

1.2. Description of Activity

The approved action under EPBC ref 2019/8569 is:

'To construct and operate the Western Outer Ring Main (WORM) high pressure gas transmission pipeline between Plumpton and Lindum Vale, northwest of Melbourne CBD, Victoria.

See EPBC Act referral 2019/8569 subject to the variation of the action accepted by the Minister under section 156B on Wednesday, 21 April 2021.'

EPBC 2019/8569 was varied on 9 November 2023 and again on 25 March 2025.

2. Western Outer Ring Main Project Overview

The Western Outer Ring Main (WORM) gas pipeline is an, approximately 51 kilometre (km), 500 millimetre (mm) nominal diameter high pressure gas transmission pipeline that now provides a high pressure connection between the eastern and western pipeline networks of the VTS.

APA VTS (Operations) Pty Ltd (APA) operates the pipeline. APA is Australia's largest natural gas infrastructure business. In Victoria, the VTS is owned and maintained by APA and consists of 2,267 km of gas pipelines. The VTS serves a total consumption base of approximately two million residential consumers and approximately 60,000 industrial and commercial users throughout Victoria.

The Pipeline and additional compression at Wollert has been designed to provide critical infrastructure for Victoria's gas supply, distribution, and consequent security, efficiency and affordability. The key objectives of the Pipelines construction and operation are to:

- Improve system resilience and security of gas supply
- Increase the amount of natural gas that can be stored for times of peak demand
- Improve network performance and reliability
- Address potential gas shortages as forecast by the Australian Energy Market Operator (AEMO) in the March 2020 Victorian Gas Planning Report update.

The WORM Pipeline is located in a 51km linear corridor extending from APA's existing Plumpton meter station to APA's existing Wollert Compressor Station. An upgrade to the Wollert Compressor Station also formed part of the Project scope and incorporated additional land at APA's operational Compressor Station. The pipeline corridor during construction was typically 30m wide with provision for additional workspace, access tracks and areas of no surface disturbance through sensitive areas such as Deep Creek and Jacksons Creek.

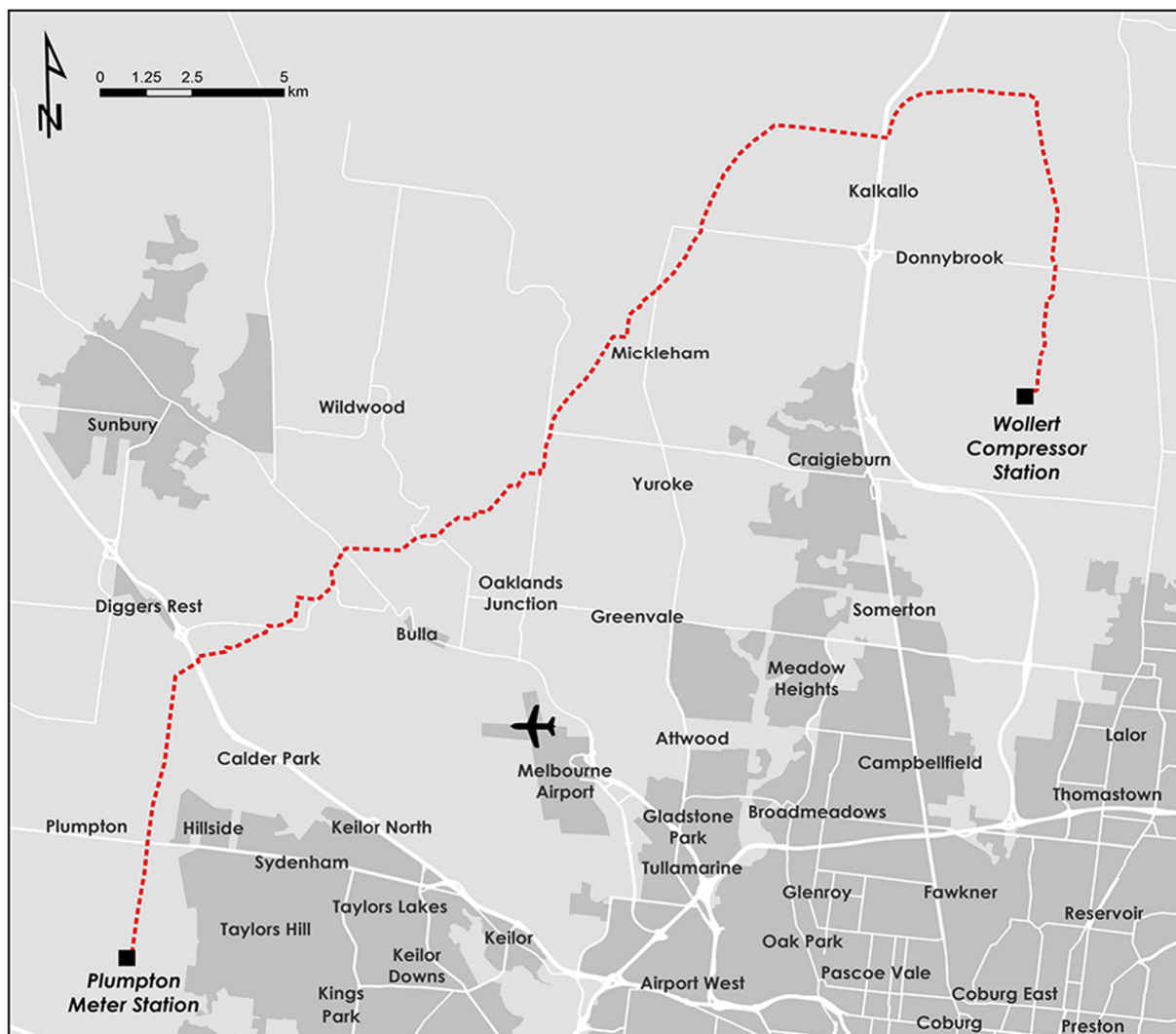


Figure 1. Overview of the WORM Pipeline.

2.1. Summary of key project milestone dates and activities

Construction of the pipeline (the action) commenced on 3rd October 2022. Operation of the pipeline formally commenced on 27th February 2024. Rehabilitation of the pipeline corridor has been ongoing through 2024 and 2025 and is nearing completion.

3. Vegetation Clearing Summary

Condition 1 of EPBC 2019/8569 provided for disturbance and clearance limits. Following completion of construction, a review was undertaken to account for total vegetation removed. Condition 1 removal limits and actual removal totals are provided in Table 2.

Table 2 – EPBC Vegetation Clearing Summary

EPBC Aspect	Disturbance Limit (Ha)	Total Actual Disturbance (Ha)	Disturbance Difference (Ha)
Native Temperate Grassland of the Victorian Volcanic Plain (NTGVVP).	4.52	4.09	- 0.43
Grassy Eucalypt Woodland of the Victorian Volcanic Plain (GEWVVP).	2.09	2.09	0.00
Golden Sun Moth Habitat	19.93	19.47	- 0.46
Striped Legless Lizard Habitat	39.92	37.04	- 2.88
Total	66.46	62.69	- 3.77

A GIS session was held on 25th October 2024 as a means of demonstrating compliance with the clearing summary. A rolling chronology of timestamped imagery was used to demonstrate where and when clearing has been undertaken and how it had been measured and accounted for. The Table 2 summary was validated via desktop mapping tools.

4. Overview of Offset Requirement, Offset Site Overview, and Offset Status

4.1. WORM Offset Requirement

Table 3 provides an overview of total Offset requirements generated by impacts to Matters of National Environmental Significance (MNES) during construction of the WORM.

Table 3 – EPBC Offset Requirement

MNES	Disturbance limit (Ha)	Quality of impacted area	Area of offset required (Ha)	Quality of Offset area	Nominated Site(s) to offset impact
Native Temperate Grassland of the Victorian Volcanic Plain (NTGVVP).	4.52	3/10	33	6/10	Cressy

Golden Sun Moth Habitat	19.93	5/10	128	6-7/10	Cressy
Striped Legless Lizard Habitat	39.92	6/10	153	8-9/10	Cressy
Grassy Eucalypt Woodland of the Victorian Volcanic Plain (GEWVVP).	2.09	4/10	6.1	6/10	Ararat-Dobie (64%)
			4.0709	1-4/10	Dunkeld (36%)

153ha of a broader 275ha property has been selected near Cressy, Vic approximately 98km west of the WORM to offset three MNES – the NTGVVP, the Golden Sun Moth habitat and the Striped Legless Lizard habitat.

The GEWVVP offset is spread between two locations. Ararat-Dobie located approximately 158km north west of the WORM Pipeline holds 6.1ha of suitable GEWVVP habitat whilst the remainder of the 10.8ha offset requirement will be regenerated at a site near Dunkeld, approximately 240km west of the WORM Pipeline.

4.2. WORM Document Requirements under EPBC 2019/8569

Table 4 provides an overview of document status of each document required by the approval conditions of EPBC 2019/8569, as amended on 25 March 2025.

Table 4 – EPBC 2019/8569 Document Status 6/01/2026

EPBC 2019/8569 Condition	Document Title	Date Prepared	Approved by DCCEW	Status
3	Ararat-Dobie Offset Management Plan. Version 4.	12/01/2024	21/03/2024	Implementation
4	Dunkeld Offset Management Plan. Version 6 (AOMP).	29/01/2025	25/03/2025	Implementation
6	Western Outer Ring Main Grassland Offset Strategy, Rev 5 April 2024	5/04/24	17/05/2024	Implementation
7	EPBC 2019/8569 Natural Temperate Grassland of the Victorian Volcanic Plain, Striped Legless Lizard <i>Delmar impar</i> and Golden Sun Moth <i>Synemon plana</i> Offset Management Plan, 6060 Hamilton Highway, Cressy, Victoria. Version 4.	4/4/2024	17/05/2024	Implementation

Each Plan and Strategy has been reviewed as part of this compliance report with evidence of implementation being observed via a collection of agreements, reporting, photos and invoices for materials such as fencing relating to site establishment and improvements.

5. Compliance Report 2025 Overview

This compliance report has been prepared January 2026. Audit meetings have been held with key project staff to review and validate authorised clearing within the Project's disturbance envelope and to go through validation of compliance with each condition within EPBC2019/8569 as amended on 25 March 2025.

5.1. Results and Findings

Of the 99 Conditions within EPBC 2019/8569,

- 76 Conditions were identified as being Compliant;
- 1 Condition achieved Partial Compliance;
- 1 Condition is considered as Pending Compliance;
- 21 Conditions are considered as Not Applicable as at this time.

Assessment of compliance is presented in detail in the form of a compliance table in Appendix A.

5.2. Opportunities for Improvement

The only opportunities for improvement can be attributed to work that is pending or still to come as the collective strategy and offset management plans are accepted and implemented:

1. Ensure that future correspondence with DCCEWW addressing ongoing approvals requirements is captured and stored appropriately.
2. Review site monitoring scopes and reports to ensure that any monitoring data from offset sites is recorded in accordance with the Department's Guidelines for biological survey and mapped data (2018).
3. Ensure that commitments in each OMP are tracked actively in a fit-for-purpose compliance system. APA has recently implemented a company-wide compliance system with a focus on regulatory licencing, approval conditions and actions to which OMP approvals conditions have been added..
4. Note the transition date on the project from CEMP to OEMP is on the 7th February 2026.

5.3. Non-compliance

No non-compliances have been recorded as part of this compliance review.

5.4. New Environmental Risks

No new environmental risks have been identified for this reporting period.

5.5. 2025-2026 Look ahead

Rehabilitation is largely complete on the pipeline corridor with sign off obtained from most landholders.

The project is to transition from the CEMP to the OMP in February 2026 with any outstanding rehabilitation activities to be transferred to the OMP.

The Ararat-Dobie and Dunkeld sites will continue to implement the actions in the offset management plan to protect and enhance vegetation quality whilst the Cressy Site will continue to establish the necessary infrastructure and pest species control required to establish site in accordance with the Offset Management Plan.

6. Conclusion

This Compliance report has been prepared in accordance with the *Annual Compliance Report Guidelines, Reporting under the Environment Protection and Biodiversity Conservation Act, 1999 (DCCEEW, 2023)*.

Other than one partial compliance item relating to an administrative notification, APA has achieved full compliance with 76 of the 99 conditions. The remainder of the conditions are either not applicable or pending at the time of reporting.

No non-compliances have been recorded for the reporting period.



Appendix A. EPBC Approval Conditions Compliance Table

CONDITION NUMBER / REFERENCE	CONDITION	COMPLIANCE LEVEL	STATUS	EVIDENCE / COMMENTS
Part A - Conditions specific to the action				
Disturbance Limits and Construction				
1	To limit the extent of impacts to NTGVVP, GEWVVP, GSM, and SLL , the approval holder must not clear :			
a)	outside the project area	Compliant	Closed	Desktop review of clearing undertaken with APA Geospatial Services Team Lead 25/10/24. All clearing was undertaken within the prescribed pipeline corridor.
b)	more than 4.52 ha of NTGVVP	Compliant	Closed	4.09ha cleared - verified via GIS desktop review of clearing on 25.10.24
c)	more than 2.09 ha of GEWVVP	Compliant	Closed	2.09ha cleared - verified via GIS desktop review of clearing on 25.10.24
d)	more than 19.93 ha of GSM habitat	Compliant	Closed	19.47ha cleared - verified via GIS desktop review of clearing on 25.10.24
e)	more than 39.92 ha of SLL habitat	Compliant	Closed	37.04ha cleared - verified via GIS desktop review of clearing on 25.10.24
2	To minimise impacts to protected matters , the approval holder must:			
a)	when undertaking construction at the Deep Creek site crossing , use Trenchless Construction	Compliant	Closed	Sighted photographic records, HDD Plan and as built drawings.
b)	when undertaking construction at the Jacksons Creek site crossing , use Trenchless Construction	Compliant	Closed	Sighted photographic records, HDD Plan and as built drawings.
c)	when undertaking construction at the Craigieburn Road site crossing , use Trenchless Construction	Compliant	Closed	Sighted photographic records, HDD Plan and as built drawings.
d)	implement the CEMP and OEMP	Pending	Open	CEMP implemented and active until Feb 2026 OEMP not yet finalised.

GEWVVP Offset - The purpose of the following conditions is to compensate for impacts to GEWVVP as a result of the Action.				
3	The approval holder must submit an Ararat-Dobie Site Offset Management Plan (ADS-OMP) to the department for the Minister's approval. The approval holder must implement the ADS-OMP as and from when approved by the Minister in writing in accordance with the timelines specified in the ADS-OMP or at least until the expiry date of this approval, whichever is the longer. The ADS-OMP must, to the satisfaction of the Minister , meet the requirements of the Environmental Offsets Policy and be consistent with the Environmental Management Plan Guidelines . The ADS-OMP must include:	Compliant	Closed	ADS-OMP submitted to DCCEEW 7/02/2024 ADS-OMP version 4 dated 12/01/24 Approved by DCCEEW (Rachel Short) 21/03/2024.
a)	A summary of the residual impacts to GEWVVP that will be compensated for by the Ararat-Dobie Site . This summary must include the extent of GEWVVP and its condition at all impact sites which the Ararat-Dobie Site is to address.	Compliant	Closed	Sighted s1.2 of the ADS-OMP
b)	A reference to the EPBC Act approval conditions to which the ADS-OMP refers.	Compliant	Closed	Sighted Table A of the ADS-OMP
c)	Measures that will be implemented to achieve the ecological benefits for GEWVVP and the timing and effort to be applied to these measures.	Compliant	Closed	Sighted ADS-OMP: Section 2. Objectives and Commitments Section 7. Management Action Table Appendix C. S.69 Landowner Agreement VC_CFL-3693_01

d)	A table of commitments made in the ADS-OMP to achieve the objectives, and a reference to where the commitments are detailed in the ADS-OMP.	Compliant	Closed	Sighted ADS-OMP: Section 2. Objectives and Commitments Section 3. Management Commitments and Actions Section 7. Management Action Table Appendix B. 'Soil Erosion Management Plan: Lot 12, 15, 17, 19, 20 and 21 Western Highway, Ararat VIC', Murrang Earth Sciences, 11th May 2020. Appendix C. S.69 Landowner Agreement VC_CFL-3693_01
e)	The reporting and review mechanisms, and documentation standards that will be implemented to inform others annually regarding compliance with management and environmental commitments, and attainment and maintenance of the ecological benefits as specified in the ADS-OMP.	Compliant	Closed	Sighted ADS-OMP: Section 2.3 Reporting Section 4. Environmental Monitoring Section 5. Audit and Review Appendix C. S.69 Landowner Agreement VC_CFL-3693_01
f)	An assessment of risks to achieving the ecological benefits and risk management strategies that will be applied to address these.	Compliant	Closed	Sighted Section 6 Risk Evaluation of the ADS-OMP
g)	A monitoring program, which must include:	Compliant	Closed	Sighted ADS-OMP:
i)	Evidence that effectively determine progress towards, attainment of and maintenance of the ecological benefits for GEWVVP	Compliant	Closed	

ii)	measurable performance indicators to monitor attainment of the ecological benefits for GEWVVP	Compliant	Closed	Section 4. Environmental Monitoring
iii)	trigger values for corrective actions	Compliant	Closed	Section 5. Audit and Review
iv)	the timing and frequency of monitoring capable of detecting trigger values and changes in the performance indicators	Compliant	Closed	Appendix C. S.69 Landowner Agreement VC_CFL-3693_01
v)	proposed corrective actions, if trigger values are reached.	Compliant	Closed	
h)	proposed corrective actions to ensure ecological benefits for GEWVVP are attained or maintained, if trigger values are reached or performance indicators not attained and	Compliant	Closed	Sighted ADS-OMP: Section 4. Environmental Monitoring Section 5. Audit and Review Appendix C. S.69 Landowner Agreement VC_CFL-3693_01
i)	links to referenced plans and applicable conditions of approval (including State approval conditions) if any.	Compliant	Closed	Sighted ADS-OMP: Section 8 References Section 9 Appendices

4	The approval holder must submit an Additional Offset Management Plan (AOMP) to the department for the Minister's approval. The approval holder must implement the AOMP as and from when approved by the Minister in writing in accordance with the timelines specified in the AOMP or at least until the expiry date of this approval, whichever is the longer. The AOMP must, to the satisfaction of the Minister, meet the requirements of the Environmental Offsets Policy and be consistent with the Environmental Management Plan Guidelines. The AOMP must include:	Compliant	Closed	AOMP Version 6, dated 29/01/2025, submitted to DCCEE 11/02/2025. AOMP Version 6, dated 29/01/25 Approved by DCCEE (Brendan Linton-Smith) 25/03/2025.
a)	A proposal which identifies one or more offset site to compensate for the impacts of the Action to GEWVP not offset by the ADS-OMP.	Compliant	Closed	Sighted Table 1 within AOMP nominating Dunkeld and Ararat Dobie as offset sites to compensate for the impacts of the action.
b)	A description of the proposed offset site or sites.	Compliant	Closed	Section 3 of the AOMP describes the site.
c)	A summary of the residual impacts to GEWVP that will be compensated for by the offset site or sites. This summary must include the area of habitat for GEWVP and its condition at all impact sites which the offset site or sites are to address.	Compliant	Closed	Summary of residual impacts sighted during desktop review of residual impacts on 24.10.24. Calculation spread sheets have been sighted and validated.
d)	A reference to the EPBC Act approval conditions to which the AOMP refers.	Compliant	Closed	Appendix 2 of the AOMP states each relevant condition, how the condition has been addressed and where it is addressed.
e)	Detailed information and shapefiles specifying the location, area and boundaries of the proposed offset site or sites.	Compliant	Closed	Figure 2 of the AOMP details mapping of habitat zones within the offset site.

f)	Detailed baseline information on the areas of habitat, their condition , and the presence (or not) of GEWVVP on the proposed offset site or sites.	Compliant	Closed	Sighted s3.3, 3.4 and 3.5 of the AOMP.
g)	Commitments to achievable improved ecological benefits at the offset site or sites and the timeframes in which they will be achieved.	Compliant	Closed	Sighted s4.1 (Objective 2), 4.2 and Table 11 of the AOMP.
h)	A table summarising all commitments to achieve the proposed ecological benefits for GEWVVP at the offset site or sites, and a reference to where each commitment is detailed in the AOMP.	Compliant	Closed	Sighted Tables 10 and 12 of the AOMP.
i)	Reporting and review mechanisms to inform the department annually regarding compliance with the management and environmental outcome commitments, and attainment and maintenance of the ecological benefits specified in the AOMP.	Compliant	Closed	Sighted s4.2.8, Tables 10, 12 and Appendix 5.
j)	An assessment of risks to achieving the proposed ecological benefits and what risk management measures and/or strategies will be applied to address these.	Compliant	Closed	Sighted Tables 10, 12 and Appendix 4 of the AOMP
k)	A monitoring program, which must specify:			
i)	Measurable performance indicators and the timeframes for their achievement to gauge attainment of the proposed ecological benefits for GEWVVP ,	Compliant	Closed	Sighted performance and completion criteria in Tables 10 and 12 of the AOMP.
ii)	Trigger values for corrective actions, and	Compliant	Closed	Sighted in Tables 10 and 12 of the AOMP.

iii)	The proposed timing (including season/time of day/frequency), methods and effort, and an explanation of how these will be effective for this purpose, of monitoring to detect trigger values, changes in the performance indicators and to gather evidence that effectively demonstrates actual progress towards, attainment of and maintenance of the ecological benefits for GEWVVP .	Compliant	Closed	Sighted s4.2.9 and Tables 10,11 and 12 of the AOMP.
l)	Corrective actions to be implemented to ensure that the proposed ecological benefits for GEWVVP are achieved or maintained if trigger values are reached or performance indicators not achieved in the specified timeframes.	Compliant	Closed	Sighted performance and completion criteria in Tables 10 and 12 of the AOMP.
m)	Links to relevant referenced plans or conditions of approval (including state approval conditions), and	Compliant	Closed	Sighted s1 of the AOMP stating the links with the WORM Ecological Offset Strategy and the ADS-OMP site to meet the full requirement for GEWVVP offsets (Table 1).
n)	How the offset site or sites will be protected, and ecological benefits maintained, at least until the expiry of the approval.	Compliant	Closed	Sighted sections 3.6, 3.7 and 4.2-4.4 of the AOMP.
4A (varied 25/03/2025)	If either or both the ADS-OMP or the AOMP have not been approved by the Minister by 27 April 2025, the Minister may give notice to the approval holder of the date on which certain specified elements of operations must be suspended and under what circumstances the specified elements of operations may be resumed. The approval holder must comply with the notice.	N/A	Closed Closed	ADS-OMP submitted to DCCEEW 7/02/2024. Approved by DCCEEW (Rachel Short) 21/03/2024 AOMP submitted to DCCEEW 11/02/2025. AOMP Approved by DCCEEW (Brendan Linton-Smith) 25/03/2025.

5 (varied 25/03/2025)	The approval holder must provide written evidence to the Department by 27 February 2025 demonstrating that the:			
a)	ADS-OMP approved by the Minister is being implemented; and	Compliant	Closed	Written evidence of the ADS-OMP being implemented provided to DCCEEW Compliance inbox by email 27 February 2025.
b)	the Ararat-Dobie Site has been secured	Compliant	Closed	Written evidence of the securing of the Ararat-Dobie site provided to DCCEEW Compliance inbox by email 27 February 2025.
5A (varied 25/03/2025)	AOMP approved by the Minister is being implemented	Compliant	Closed	Written evidence of the AOMP being implemented provided to by email to DCCEEW Compliance 26 March 2025

5B (varied 25/03/2025)	Offset site or sites identified in the AOMP approved by the Minister in writing has been secured .	Compliant	Closed	Trust for Nature Deed of Covenant registered on title 10/09/2025
NTGVVP, GSM and SLL Offset - The purpose of the following conditions is to compensate for impacts to NTGVVP, GSM and SLL as a result of the				
6	The approval holder must, before 1 February 2024, submit to the department for the Minister's written approval a Grassland Offset Strategy (GOS). The approval holder must implement the GOS as and from when it is approved by the Minister in writing in accordance with the timelines specified in the GOS or at least until the expiry date of this approval, whichever is the longer. The GOS must, to the satisfaction of the Minister , meet the requirements of the Environmental Offsets Policy . The GOS must:	Compliant	Closed	Version 5 of the GOS, dated April 2024, was approved by DCCEEW (Rachel Short) on 09/05/2024.
a)	identify and describe an offset site	Compliant	Closed	Sighted Section 5.1 of the approved GOS

b)	demonstrate that the offset site is of a size and scale proportionate to the residual impacts on NTGVVP , GSM and SLL , according to the Environmental Offsets Policy	Compliant	Closed	Sighted the GOS: Section 4 Impacts and Offset Requirements Section 5.1 Offset Site Appendix A Offset assessment guide calculations Appendix B Supporting information for Offset calculations
c)	commit to specific ecological outcomes for NTGVVP , GSM and SLL	Compliant	Closed	Sighted the GOS: Section 5.2 Offset Measures Appendix B Supporting Information for Offset calculations
d)	specify management measures which will be undertaken on the offset site to achieve condition improvement	Compliant	Closed	Sighted the GOS Section 5.2 Offset Measures

6A	If the GOS has not been approved by the Minister prior to 2 April 2024 the Minister may give notice to the approval holder of the date on which specified elements of operations must cease and under what circumstances the specified elements of operations may be resumed. The approval holder must comply with the notice.	N/A	Closed	Version 5 of the GOS, dated April 2024, was approved by DCCEEW (Rachel Short) on 09/05/2024.
7	The approval holder must submit to the department for the Minister's approval a Grassland Offset Management Plan (GOMP) for the offset site identified in the approved GOS. The approval holder must ensure that the GOMP, as approved by the Minister in writing, is implemented in accordance with the timelines specified in the GOMP or at least until the expiry date of this approval, whichever is the longer. The GOMP must, to the satisfaction of the Minister , meet the requirements of the Environmental Offsets Policy and Environmental Management Plan Guidelines , and must include:	Compliant	Closed	Final version of GOMP submitted 9th April 2024 Approval letter dated 17th May 2024 Section 5 of GOMP demonstrates how the offset meets the requirements of each Principle of the Environmental Offsets Policy. Implementation active.
a)	A summary of the residual impacts to NTGVVP , GSM and SLL that will be compensated for by the offset site. This summary must include the area of habitat for protected matters and the condition at all impact sites which the offset site is to address.	Compliant	Closed	Sighted the approved GOS and Section 2.3 of the GOMP.

b)	The relevant protected matters and a reference to the EPBC Act approval conditions to which the GOMP refers.	Compliant	Closed	Sighted in Section 1.1 of the GOMP.
c)	Specific, timebound and measurable ecological benefits for the relevant protected matters .	Compliant	Closed	Sighted Section 4.2, Table 16 and Table 18 of the GOMP.
d)	Measures that will be implemented to achieve the ecological benefits and the timing and effort to be applied to these measures.	Compliant	Closed	Sighted section 4.2 of the GOMP
e)	A table of commitments to achieve the ecological benefits, and a reference to where the commitments are detailed in the GOMP.	Compliant	Closed	Sighted Tables 16, 17 and 18 of the GOMP
f)	The reporting and review mechanisms, and documentation standards that will be implemented to inform others annually regarding compliance with management and environmental commitments, and attainment and maintenance of the ecological benefits as specified in the GOMP.	Compliant	Closed	Sighted Section 4.2.7, Tables 16, 17, 18 and Appendix 6 Annual Reporting Template of the GOMP.
g)	An assessment of risks to achieving the ecological benefits and what risk management strategies will be applied to address these.	Compliant	Closed	Sighted Appendix 5 of the GOMP Sighted tables 16 and 18
h)	A monitoring program, which must include:			
i)	collecting evidence that effectively determines progress towards, attainment of and maintenance of the ecological benefits for the protected matters	Compliant	Closed	Sighted Section 4.2.7, Table 16 and Table 18 of the GOMP. Annual monitoring and reporting by the Landowner has commenced. Year 1 reporting provided to DCCEEW Compliance 12 June 2025.

ii)	measurable performance indicators to monitor attainment of the ecological benefits for the protected matters	Compliant	Closed	Sighted Table 16 and Table 18 of the GOMP
iii)	trigger values for corrective actions	Compliant	Closed	Sighted Table 16 and Table 18 of the GOMP
iv)	the timing and frequency of monitoring capable of detecting trigger values and changes in the performance indicators	Compliant	Closed	Sighted Table 16 and Table 18 of the GOMP
i)	Proposed corrective actions to ensure ecological benefits for the protected matters are attained or maintained, if trigger values are reached or performance indicators not attained	Compliant	Closed	Sighted Table 16 and Table 18 of the GOMP
j)	Links to referenced plans and applicable conditions of approval (including State approval conditions) if any.	Compliant	Closed	Sighted GOS References Section and Appendices Section
8	Within 12 months of the Minister approving the GOS, the approval holder must provide written evidence to the Department demonstrating that the:			
a)	GOMP as approved by the Minister in writing is being implemented	Compliant	Closed	Sighted invoice for 'Stage 1' infrastructure works including fencing, roading and stock adjustments. Annual monitoring and reporting by the Landowner has commenced. Year 1 reporting provided to DCCEEW Compliance 12 June 2025.

b)	Offset site identified in the GOMP has been secured .	Compliant	Closed	s173 Council agreement - fully executed 13th June 2024. Trust for Nature Covenant registered on title 19/08/2025.
8A	If the GOMP has not been approved by the Minister within 12 months of the Minister's approval of the GOS, the Minister may give notice to the approval holder of the date on which specified elements of operations must be suspended and under what circumstances the specified elements of operations may be resumed. The approval holder must comply with the notice.	N/A	Closed	GOS approved 09/05/2024 GOMP approved 17/05/2024
Part B - Standard administrative conditions				
9	The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action .	Partial	Closed	Verbal notification was provided to DCCEEW. Dialogue continued frequently following commencement of the action regarding commitments relating to the Approval. Unable to locate written notification but this may be on staff members emails who have subsequently left the business.
9A	The approval holder must notify the Department in writing of the date of commencement of operations within 10 business days after the date of commencement of operations .	Compliant	Closed	Sighted notification of operation on 27th February 2024 - email sent Friday 1st March 2024.
10	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 .	N/A	Closed	Action formally commenced on 3rd October 2023.

11	The approval holder must maintain accurate and complete compliance records .	Compliant	Active	Reviewed vegetation removal GIS records on 24.10.24. Dataset is complete with accurate measurements of EPBC vegetation removal within allowable limits. Scope for annual reports from each offset site include provision for evaluation of compliance parameters detailed in each OMP and strategy. This would form an accurate basis to monitor establishment and implementation of the OMPs across each offset site.
12	If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.	Compliant	Active	No requests in writing for compliance records have been received from the Department.
13	The approval holder must:			
a)	submit plans electronically to the Department	Compliant	Closed	Sighted emails to Department containing electronic copies of submitted plans.
b)	unless otherwise agreed to in writing by the Minister , publish each plan on the website within 20 business days of the date:			
i)	of this approval, if the version of the plan to be implemented is specified in these conditions; or	N/A	Closed	No specific Versions stated in the conditions.
ii)	that the plan is approved by the Minister in writing, if the plan requires the approval of the Minister ; or	Compliant	Closed	Sighted plans on website

iii)	that the plan is approved under the Pipelines Act 2005 (Vic) if the plan is required under the Pipelines Act 2005 (Vic).	N/A	Closed	No plans in these conditions require to be approved under the Pipelines Act 2005 (Vic).
14	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under a plan , is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to the Department in accordance with the requirements of the plan .	Compliant	Active	GOMP annual monitoring and reporting by the Landowner has commenced with Year 1 reporting provided to DCCEEW Compliance 12 June 2025.
15	The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action , or otherwise in accordance with an annual date that has been agreed to in writing by the Minister . The approval holder must:	Compliant	Active	23/24 Compliance report submitted and published February 2025. This (24/25) report to be submitted and published.
a)	publish each compliance report on the website within 60 business days following the relevant 12 month period	Compliant	Active	Publish date no later than Wednesday 12 February of each year.
b)	notify the Department by email that a compliance report has been published on the website and provide the weblink for the compliance report within 5 business days of the date of publication	Compliant	Active	APA to provide written notification to DCCEEW following upload of this report on Project website. Completed to 23/24 - email sent 11 February 2025.
c)	keep all compliance reports publicly available on the website until this approval expires	Compliant	Active	Compliance reports shall be uploaded on website and retained until 2072.
d)	exclude or redact sensitive ecological data from compliance reports published on the website	Compliant	Active	Content of this Compliance report does not include sensitive ecological data.

e)	where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication.	N/A	N/A	Published Compliance report has not been redacted.
16	The approval holder must notify the Department in writing of any: incident ; non-compliance with the conditions; or non-compliance with the commitments made in plans . The notification must be given as soon as practicable, and no later than 2 business days after becoming aware of the incident or non-compliance. ~~The notification must specify:~~	N/A	N/A	No incidents or non-compliances reported to date.
a)	any condition which is or may be in breach	N/A	N/A	No incidents or non-compliances to date
b)	a short description of the incident and/or non-compliance	N/A	N/A	No incidents or non-compliances to date
c)	the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.	N/A	N/A	No incidents or non-compliances to date
17	The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:	N/A	N/A	No incidents or non-compliances to date.
a)	any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future	N/A	N/A	No corrective actions to date
b)	the potential impacts of the incident or non-compliance	N/A	N/A	No incidents or non-compliances to date
c)	the method and timing of any remedial action that will be undertaken by the approval holder.	N/A	N/A	No incidents or non-compliances to date

18	The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister .	N/A	N/A	No independent audits requested.
19	For each independent audit , the approval holder must:			
a)	provide the name and qualifications of the independent auditor and the draft audit criteria to the Department	N/A	N/A	No independent audits requested.
b)	only commence the independent audit once the audit criteria have been approved in writing by the Department	N/A	N/A	No independent audits requested.
c)	submit an audit report to the Department within the timeframe specified in the approved audit criteria.	N/A	N/A	No independent audits requested.
20	The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.	N/A	N/A	No independent audits requested.
21	Within 30 days after the completion of the action , the approval holder must notify the Department in writing and provide completion data .	N/A	N/A	No independent audits requested.