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# **Third-Party Environmental Compliance Audit, WORM Pipeline – Reinstatement audit**

**Rev 0**

**8 September 2025**



# **AVENTUS**

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## DOCUMENT CONTROL

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### Project Team

| Name             | Title                              | Project role      |
|------------------|------------------------------------|-------------------|
| Giulio Pinzone   | Principal Environmental Consultant | Lead auditor      |
| Hamilton Radloff | Environmental Consultant           | Assistant auditor |

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*Front cover photo: WORM Pipeline crossing at Merri Creek*

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## 1 Introduction

APA Group (APA) contracted Aventus Consulting Pty Ltd (Aventus) to undertake regulatory third-party compliance audits against various construction and rehabilitation environmental management plans (EMPs) for the Western Outer Ring Main (WORM) gas pipeline.

A condition of project approval is that a suitably qualified external auditor is contracted to audit compliance against the WORM Project's EMPs, with the auditor selection subject to approval from the Department of Environment, Land, Water and Planning (DELWP) (now the Department of Energy, Environment and Climate Action, DEECA) under the *Pipelines Act 2005* (Vic). The APA construction EMP was approved by the then DELWP on the 26th of July 2022.

In consultation with DEECA (DELWP at the time), APA has determined that four compliance audits will take place, these being:

- Initial pre-construction audit (late September 2022);
- Construction progress audit (early 2023);
- Reinstatement completion audit (late 2023 - 2024); and
- Close-out audit (late 2025/early 2026, two years after the end of construction).

This audit report addresses the third audit.

### 1.1 Aventus Consulting

Aventus is a Melbourne-based environmental consultancy that has been operating since 2009, specialising in environmental and safety approvals, assurance and auditing for the energy industry. The company partners with titleholders and contractors to obtain project environmental and safety approvals and guide these approvals through to project completion through assurance and compliance work. As of mid-2025, Aventus has undertaken over 65 environmental compliance audits. More information about the company can be found on its website at: [www.ventusconsulting.com.au](http://www.ventusconsulting.com.au)

### 1.2 Objectives

The objective of the reinstatement completion audit is to verify that rehabilitation of the pipeline construction right-of-way (RoW) is being undertaken in accordance with the APA construction EMP and associated sub-plans.

### 1.3 Limitations

Due to the inherent limitations of any compliance audit (i.e., its 'snap-shot' nature), it is possible that error or non-compliance may occur and may not be detected. A one-off compliance audit cannot detect all instances of compliance or otherwise with the conditions as set out in the approval documents, as the audit is not performed continuously throughout the duration of the project.

The content of this report applies only to matters that were available to and/or evident to the auditors at the time of this audit and within the scope of the audit. The status of legal compliance can change in a limited time.

No other warranty, expressed or implied, is made as to the professional advice indicated in this report. Note that it may not contain sufficient information for the purposes of other parties or for other uses.

The hundreds of conditions audited within the CEMP and sub-plans meant that an infinite amount of time could be spent determining the level of compliance for each. Where compliance was unable to be determined after multiple requests for information, and given the finite time available to the auditors, in many instances a finding of 'observation' was provided.

The conclusion reached in Section 4 of this report is formed on the basis outlined above.

## 2 Audit Process

### 2.1 Methodology

This field and desktop audit was conducted in line with AS/NZS ISO 19011:2018, Guidelines for auditing management systems, which is summarised in Figure 2.1.

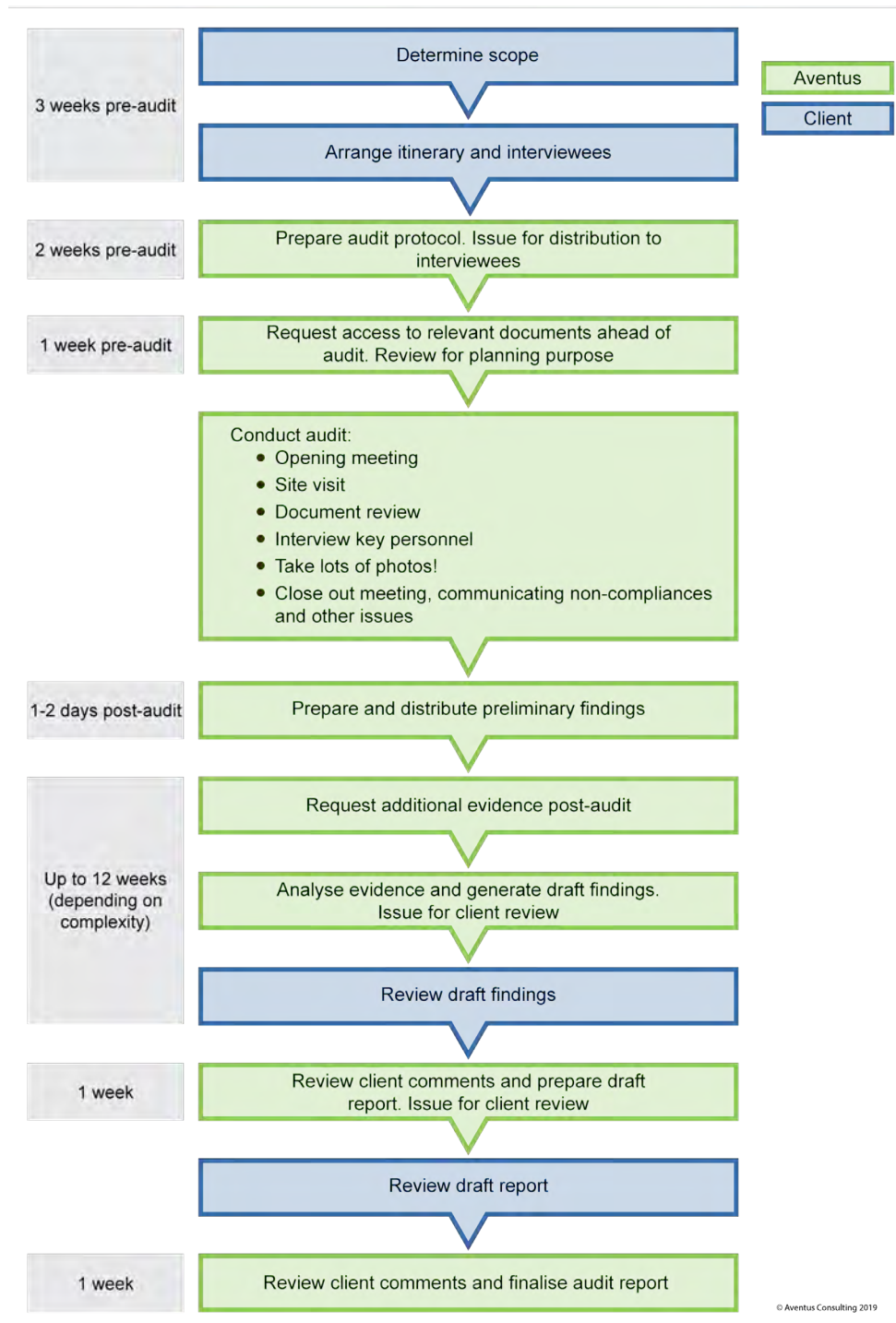


**Figure 2.1. Generalised audit schedule**

## 2.2 Auditors

The audit team consisted of Giulio Pinzone as Lead Auditor, with Hamilton Radloff and Belinda Phanphengdy as assistant auditors. Brief biographies are presented here.

### 2.2.1 Giulio Pinzone, Principal Environmental Consultant – Lead Auditor

Giulio Pinzone is the Principal Environmental Consultant at Aventus and has 25 years' environmental management experience. Giulio is degree-qualified with a Bachelor of Applied Science (Natural Resources Management) and Bachelor of Science (Honours).

Giulio is an Exemplar Global-accredited Environmental Management Systems (EMS) Lead Auditor (certificate 129371). DELWP (now DEECA) approved Giulio to be the lead auditor for this audit series via email (Mr Don Hough, DELWP, 29th of August 2022).

Giulio has undertaken close to 100 environmental compliance audits. Prior to founding Aventus, Giulio undertook several pipeline construction environmental compliance audits for GasNet (now APA) and Santos. Giulio held the role of Field Environment Advisor during the construction of the Casino Gas Pipeline in southwest Victoria and is very familiar with pipeline construction environmental management issues.

### 2.2.2 Assistant Auditors

Hamilton Radloff and Belinda Phanphengdy are graduate environmental consultants who are learning about all facets of the energy industry, including its unique environmental management challenges and regulatory framework.

Hamilton and Belinda do not have any formal auditing qualifications, and this audit formed part of their professional development. Hamilton Radloff undertook the majority of the evidence analysis.

## 2.3 Auditees

The auditors thank Stephen Talbot, APA's Environmental Advisor, for his assistance during the audit.

## 2.4 Audit Process

The process undertaken for this audit is outlined below:

- On the morning of the field inspection (22 October 2024), the auditors attended the Wollert compressor station site.
- The auditors were guided around the perimeter of the compressor station site by the Environmental Advisor before inspecting other parts of the rehabilitated pipeline easement.
- The auditors and the APA Environmental Advisor visited various sites along the pipeline, including Conservation 28B, Merri Creek, Jackson Creek, Deep Creek and Property 1 PS733045. Minor watercourse crossings were not visited; the focus was the major watercourses.
- Following the visual inspection, the auditors requested evidence from APA in an iterative fashion to support the visual observations.
- A list of preliminary findings was issued to APA two business days after the audit.
- A draft list of findings was issued to APA for review, followed by a copy of the draft audit report and final audit report.

## 3 Audit Findings

### 3.1 Definitions of Findings

APA requested that the audit findings are reported in accordance with the definitions provided in *APA HSE GP 15.01 T1 Audit and Self-Assessment Supplementary Information*, which is presented in Table 3.1.

**Table 3.1. APA audit finding definitions**

| Category                    | Definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Acceptable                  | Compliant with requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Major non-conformance       | <ul style="list-style-type: none"> <li>A complete or near complete absence of a required management system; and/or</li> <li>Supporting system document is available but the requirements are, to a large degree, not implemented (being followed); and/or</li> <li>Where the design intent of a management system significantly fails to produce the required results; and/or</li> <li>Where a number of related minor non-conformances indicates that a management system fails to produce the desired results or control.</li> </ul> |
| Minor non-conformance       | Where a non-conformance(s) is considered to have only a minor effect on the overall management system.                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Observation                 | The auditor has observed an area that appeared not to conform but could not confirm a non-conformance.                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Opportunity for improvement | A suggestion for improvement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Not applicable              | The requirement is not applicable in this instance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

### 3.2 Audit Results

This section summarises the findings of the audit. A total of 418 conditions were audited, with Table 3.2 providing a list of documents audited.

**Table 3.2. List of audited documents**

| Document                                   | Version | Conditions |
|--------------------------------------------|---------|------------|
| Reinstatement and Rehabilitation Procedure | Rev 0   | 78         |
| APA CEMP                                   | Rev 10  | 83         |
| Wasco CEMP                                 | Rev D   | 9          |
| Jackson Creek Site Specific EMP            | Rev C   | 27         |
| Merri Creek Site Specific EMP              | Rev 1   | 62         |
| Deep Creek Site Specific EMP               | Rev 1   | 8          |
| Conservation Area 28B                      | Rev 0   | 38         |
| Property 1 PS733045                        | Rev B   | 26         |
| Tree MP                                    | Rev 0   | 3          |
| Primary Erosion and Sediment               | Rev B   | 20         |

|                              |       |            |
|------------------------------|-------|------------|
| Minor Watercourse Crossing   | Rev C | 32         |
| Fauna MP                     | Rev 1 | 13         |
| Sodic and Dispersive Soil MP | Rev 0 | 19         |
| <b>Total</b>                 |       | <b>418</b> |

### 3.2.1 Summary Findings

A summary of the audit findings is provided in Table 3.3. These results indicate a strong level of compliance with the EMPs has been achieved.

**Table 3.3. Summary of results**

| Document                                   | Acceptable | Major non-conformance | Minor non-conformance | Observation | OFI         | N/A          |
|--------------------------------------------|------------|-----------------------|-----------------------|-------------|-------------|--------------|
| Reinstatement and Rehabilitation Procedure | 63         | 0                     | 0                     | 9           | 4           | 2            |
| APA CEMP                                   | 68         | 0                     | 0                     | 3           | 2           | 10           |
| Wasco CEMP                                 | 1          | 0                     | 0                     | 7           | 0           | 0            |
| Jackson Creek Site Specific EMP            | 16         | 0                     | 0                     | 8           | 0           | 3            |
| Merri Creek SSEMP                          | 42         | 0                     | 0                     | 6           | 3           | 11           |
| Deep Creek SSEMP                           | 4          | 0                     | 0                     | 4           | 0           | 0            |
| Conservation Area 28B                      | 25         | 0                     | 0                     | 2           | 3           | 8            |
| Property 1 PS733045                        | 4          | 0                     | 0                     | 8           | 4           | 10           |
| Tree MP                                    | 2          | 0                     | 0                     | 0           | 0           | 1            |
| Minor Watercourse Crossing Procedure       | 12         | 0                     | 0                     | 19          | 0           | 1            |
| Primary Erosion and Sediment MP            | 16         | 0                     | 0                     | 3           | 0           | 1            |
| Fauna MP                                   | 13         | 0                     | 0                     | 0           | 0           | 0            |
| Sodic and Dispersive Soil MP               | 13         | 0                     | 0                     | 2           | 0           | 4            |
| <b>TOTAL</b>                               | <b>280</b> | <b>0</b>              | <b>0</b>              | <b>71</b>   | <b>16</b>   | <b>51</b>    |
| <b>Percentage</b>                          | <b>67%</b> | <b>0%</b>             | <b>0%</b>             | <b>17%</b>  | <b>3.8%</b> | <b>12.2%</b> |

Most of the 'Not applicable' findings relate to commitments based on the construction phase and close out phase of the project.

Detailed findings against each of the conditions are provided in Appendix A. During the site inspections, photographs were taken to support the audit findings; key photos supporting the audit findings are provided in Appendix B.

### 3.2.2 Acceptable and Observation Findings

There are 280 acceptable findings and 71 observation findings, which represent 67% and 17% respectively, of the audited conditions. A more in-depth review of these findings is provided in Table 3.4.

**Table 3.4. Acceptable and observation findings from EMPs**

| Document                                   | Evidence of acceptability                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Observation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|--------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Reinstatement and Rehabilitation Procedure | <ul style="list-style-type: none"> <li>Pipeline RoW was reinstated in accordance with the project's SSEMPs.</li> <li>Erosion control measures were used.</li> <li>Rehabilitation of protected species habitat was completed in a timely manner.</li> <li>Inspections were carried out in accordance with the procedure.</li> </ul>                                                                                                                                                                                                                                                                                                        | <p>Nine (9) observations were identified, generally classified as follows:</p> <ul style="list-style-type: none"> <li>Poorly worded commitments made it difficult for auditors to determine compliance.</li> <li>Watering records were not included as prompts for site inspections.</li> <li>Evidence was not available regarding sign off of pre-start meetings on this topic.</li> <li>Documentary evidence was not available to verify verbal evidence regarding material (i.e., excavated rock, rubbish, etc) being removed from site.</li> </ul> |
| APA CEMP                                   | <ul style="list-style-type: none"> <li>Rehabilitation of the pipeline was undertaken in accordance with the timeline in the construction EMP.</li> <li>Reinstatement and rehabilitation of the pipeline construction RoW appeared acceptable.</li> <li>Road reservations were restored in consultation with local council.</li> <li>Waterway contours such as Merri Creek were reinstated to their pre-construction state.</li> <li>Vegetation cover across the pipeline RoW was above 70%.</li> <li>Specific SSEMPs were prepared and implemented.</li> <li>Native vegetation was replanted in line with the specific SSEMPs.</li> </ul> | <p>Three (3) observations were identified, generally classified as follows:</p> <ul style="list-style-type: none"> <li>Inspection checklists did not include certain prompts to allow for compliance to be determined.</li> <li>Documentary evidence was not available to verify verbal evidence regarding importing soil to site.</li> </ul>                                                                                                                                                                                                          |
| Wasco CEMP                                 | <ul style="list-style-type: none"> <li>Auditors sighted reinstatement around the site with ground vegetation coverage above 70%. Batters displayed minimal signs of erosion, and the access track and car park were easily defined with no signs of works taking place outside the RoW.</li> </ul>                                                                                                                                                                                                                                                                                                                                        | <p>Seven (7) observations were identified, generally classified as follows:</p> <ul style="list-style-type: none"> <li>Evidence was not available to determine compliance.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                  |
| Jackson Creek SSEMP                        | <ul style="list-style-type: none"> <li>Areas of exposed soils were minimised with progressive reinstatement.</li> <li>Soil amelioration occurred in line with the SSEMP.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <p>Eight (8) observations were identified, generally classified as follows:</p> <ul style="list-style-type: none"> <li>Evidence to confirm soil testing and backfilling at containment dam were not available.</li> </ul>                                                                                                                                                                                                                                                                                                                              |

| Document                                       | Evidence of acceptability                                                                                                                                                                                                                                                           | Observation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                | <ul style="list-style-type: none"> <li>Erosion has been minimised with the HDD entry and exit locations appearing stable with erosion sediment controls still in place within the tributary.</li> <li>Fencing was observed in place upon entry to the McKenzie property.</li> </ul> | <ul style="list-style-type: none"> <li>Inspection checklists did not include certain prompts to allow for compliance to be determined.</li> <li>Evidence was not available to confirm consultation with the Registered Aboriginal Party was undertaken prior to rehabilitation.</li> </ul>                                                                                                                                                                                                                                                                                                                                     |
| Merri Creek SSEMP                              | <ul style="list-style-type: none"> <li>Merri Creek bed and banks were reinstated to pre-construction contours as close as reasonably practicable.</li> <li>Soil amelioration occurred at Merri Creek in line with the SSEMP.</li> <li></li> </ul>                                   | <p>Six (6) observations were identified, generally classified as follows:</p> <ul style="list-style-type: none"> <li>Inspection checklists did not include certain prompts to allow for compliance to be determined.</li> <li>Insufficient amelioration data was available.</li> <li>Evidence of weed knockdown was not available.</li> <li>Evidence to confirm weather forecast and water monitoring was not available.</li> </ul>                                                                                                                                                                                            |
| Deep Creek SSEMP                               | <ul style="list-style-type: none"> <li>Disturbance along the RoW was minimised and reinstated.</li> <li>Erosion has been minimised with the HDD entry and exit locations appearing stable.</li> </ul>                                                                               | <p>Four (4) observations were identified, generally classified as follows:</p> <ul style="list-style-type: none"> <li>Evidence regarding fertiliser application at Deep Creek was not available.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Conservation Area 28B SSEMP                    | <ul style="list-style-type: none"> <li>Pipeline RoW was reinstated in accordance with the SSEMP and ground cover was above 70%.</li> <li>Site was clear of rubbish.</li> <li>Weed cover was absent or very low.</li> </ul>                                                          | <p>Two (2) observations were identified, generally classified as follows:</p> <ul style="list-style-type: none"> <li>Evidence in the form of documentation in relation EMPs was not available.</li> <li>Weather forecast monitoring records were not included in site inspection records.</li> </ul>                                                                                                                                                                                                                                                                                                                           |
| Site Rehabilitation Plan - Property 1 PS733045 | <ul style="list-style-type: none"> <li>Soil ripping was evident.</li> <li>Vegetation ground cover appeared above 70%.</li> <li>Minimal weed coverage was evident.</li> </ul>                                                                                                        | <p>Eight (8) observations were identified, generally classified as follows:</p> <ul style="list-style-type: none"> <li>The auditors were advised that the property is used for pasture and grazing, and was not previously vegetated with native grasses as the desktop ecology report indicated. As such, pasture grasses rather than native grasses were used in rehabilitation of this property, as agreed with the landowner.</li> <li>Evidence in the form of documentation in relation to vehicle weed and seed inspections was not available.</li> <li>Evidence of fertiliser application was not available.</li> </ul> |

| Document                             | Evidence of acceptability                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Observation                                                                                                                                                                                                                                                                                                                                           |
|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Tree MP                              | <ul style="list-style-type: none"> <li>Auditors sighted the re-use of felled hollow trunks at Merri Creek. Hollow trunks were placed along the top of banks of the creek to provide local fauna habitat.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                    | No observations.                                                                                                                                                                                                                                                                                                                                      |
| Minor Watercourse Crossing Procedure | <ul style="list-style-type: none"> <li>There was minimal exposed soil with vegetation cover above 70%.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>Nineteen (19) observations were identified, generally classified as follows:</p> <ul style="list-style-type: none"> <li>Auditors have not sighted evidence of the reinstatement of minor watercourse crossings.</li> <li>Evidence of progressive reinstatement of minor watercourse crossings was not available.</li> </ul>                        |
| Primary Erosion and Sediment MP      | <ul style="list-style-type: none"> <li>Rehabilitation at Merri Creek, Jackson Creek and Conservation Area 28B was undertaken in accordance with relevant SSEMPs, with site inspection records confirming progressive reinstatement.</li> <li>Land contours were congruent with surrounding areas.</li> <li>Waterways were reinstated to pre-construction conditions.</li> <li>Waterway and floodplain function did not appear altered from the pre-construction state.</li> <li>Areas inspected by the auditors did not indicate that unauthorised work occurred off the pipeline easement.</li> </ul> | <p>Three (3) observations were identified, generally classified as follows:</p> <ul style="list-style-type: none"> <li>The timeliness of reinstatement of protected species habitat areas could not be ascertained.</li> <li>Disposal records of removed site spoil and material removed from sediment control devices were not available.</li> </ul> |
| Fauna MP                             | <ul style="list-style-type: none"> <li>Rehabilitation of construction and temporary work areas were reinstated to pre-construction topographic contours and appropriately re-vegetated.</li> <li>Hollow branches, logs and trunks were re-used to provide fauna habitat, where possible.</li> <li>Fencing was in place to separate protected species habitats with parts of the RoW that were subject to soil ripping.</li> <li>No permanent removal of protected species habitats occurred.</li> </ul>                                                                                                | No observations.                                                                                                                                                                                                                                                                                                                                      |

| Document                     | Evidence of acceptability                                                                                                                                                                                                                                           | Observation                                                                                                                                                                                                                                                                                      |
|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sodic and Dispersive Soil MP | <ul style="list-style-type: none"> <li>Topography, infrastructure and appropriate vegetation was as close as reasonably practicable to pre-construction state.</li> <li>Fertiliser application and soil amelioration was undertaken in line with the MP.</li> </ul> | <p>Two (2) observations were identified, classified as follows:</p> <ul style="list-style-type: none"> <li>Commitments are poorly worded, making it difficult to assess.</li> <li>Evidence provided did not contain the level of detail required to make an assessment of compliance.</li> </ul> |

### 3.2.3 Major and Minor Non-conformances

There were no major or minor non-conformances findings for this audit.

### 3.2.4 Opportunities for improvement

There are 16 opportunities for improvements (OFIs), which represent 3.8% of the audited conditions. These are generally classified as follows:

- The commitments in the various EMPs were often vague and unclear and did not meet the SMART (Specific, Measurable, Achievable, Realistic and Time-based) criteria, making them very difficult to audit.
- The need for clearer and more detailed monitoring records to ensure compliance is readily auditable (i.e., trench crowning and weather monitoring).

Further details of the OFIs are provided in Table 3.5.

**Table 3.5. Opportunities for Improvements**

| Document                                   | Commitment                                                                                                                                                                                                                                      | OFI                                                                                                                                                                                                                                                                                     |
|--------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Reinstatement and Rehabilitation Procedure | When operating machinery, or penetrating the ground around existing APA pipelines, follow all relevant APA Permit to Work systems, SWMS, operating procedures and guidelines.                                                                   | The auditors do not know what all relevant permit to work systems, other procedures and guidelines are, therefore this cannot be audited. This is an example of a commitment not being specific enough to audit.                                                                        |
|                                            | The pipeline trench will be compacted per required specification and 'crowned' to prevent water pooling or travelling down the trench line.                                                                                                     | The site inspections undertaken by SPIECAPAG were recorded on a proforma. The site inspection proforma did not include prompts regarding trench crown inspections. Therefore, the auditors could not make a finding against this commitment.                                            |
|                                            | All material removed from a sediment control device during maintenance or decommissioning, whether solid or liquid, must be disposed of in a manner that does not cause ongoing soil erosion or environmental harm.                             | The site inspections undertaken by SPIECAPAG were recorded on a proforma. The site inspection proforma did not include prompts regarding the removal of site spoil or material from sediment control devices. Therefore, the auditors could not make a finding against this commitment. |
|                                            | Site spoil must be lawfully disposed of in a manner that does not result in ongoing soil erosion or environmental harm.                                                                                                                         |                                                                                                                                                                                                                                                                                         |
| APA CEMP                                   | Following completion of reinstatement, agreement must be sought from landowners (and occupiers, managers or government agencies as applicable) of the satisfaction of the reinstatement work as required by conditions of the Pipeline Licence. | This commitment does not identify the reinstatement timeframe. It is assumed that the timeframe is 24 months after completion of construction, but this is not made clear, therefore the auditors assume that sign off from landowners                                                  |

| Document              | Commitment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | OFI                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                       | Reinstatement will be undertaken in accordance with landowner agreements required under the Pipeline Licence.                                                                                                                                                                                                                                                                                                                                                                                                     | does not need to be closed out until the 24-month rehabilitation period closes (in February 2026).<br>At the time of the field inspection several landowners still had not signed off on reinstatement. As of the time of preparing this report, several landowners had still not signed off on reinstated. Without a specified timeframe for obtaining landowner signoff, it is not possible to determine compliance with this commitment. |
| Merri Creek SSEMP     | Any weeds identified in Conservation Areas will be added to the Environmental Line List to prompt maintenance during reinstatement and rehabilitation.                                                                                                                                                                                                                                                                                                                                                            | The Environmental Line List does not list any weeds for the Merri Creek conservation area (KP 48 - 49.5). It is unclear whether weeds are present or not and therefore whether they should be listed on the Environmental Line List.                                                                                                                                                                                                        |
|                       | After the weed contractor conducts weed management on behalf of SCA, the weed management contractor will provide a Weed Monitoring Report to SCA which details: <ul style="list-style-type: none"> <li>• Date of monitoring</li> <li>• Target to be achieved at 12- and 24-months and their status</li> <li>• Any actions undertaken</li> <li>• Any priority weeds within the conservation area</li> <li>• Any contingencies required to be implemented for SCA to reach the 12- and 24-month targets.</li> </ul> | SPEICAPAG records confirm HL Landscapes was used to conduct weed management. However, maintenance records (weed monitoring report) do not discuss weed targets or contingencies required for the 12- and 24-month periods across the conservation area.                                                                                                                                                                                     |
| Conservation Area 28B | Reinstatement of the construction footprint will occur as soon as reasonably practicable after construction by reinstating the Conservation Area's existing contours to pre-construction conditions as far as reasonably practicable.                                                                                                                                                                                                                                                                             | The term 'as soon as reasonably practicable' is not defined and therefore cannot be audited. This is an example of a commitment not being specific enough to audit.                                                                                                                                                                                                                                                                         |
|                       | SCA will rectify any items raised in this walkthrough in a timely manner in priority of the identified hazards which have the greatest risk to the environment.                                                                                                                                                                                                                                                                                                                                                   | The term 'timely manner' is not defined and therefore cannot be audited. This is an example of a commitment not being specific enough to audit.                                                                                                                                                                                                                                                                                             |
| Property 1 PS733045   | SCA will water the entire Protected Area being rehabilitated within 1 week of applying the seed mix to stimulate germination.                                                                                                                                                                                                                                                                                                                                                                                     | No inspection records were sighted to confirm that the protected area was watered within 1 week of seed application.<br>The APA Environmental Advisor advised that Property 1 PS733045 was wet at                                                                                                                                                                                                                                           |

| Document | Commitment | OFI                                                                                                                                                                                                                                                         |
|----------|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |            | the time of seeding, and poor access due to rainfall made it not feasible to water. The auditors recollect 2024 was a wet year and that it was wet during pipeline construction and rehabilitation, however there are no inspection records to verify this. |

### 3.2.5 Not Applicable

There are 51 'not applicable' findings, which represent 12.2% of the audited conditions. These are generally classified as follows:

- Construction works (which are the subject of the previous audit).
- Commitments that were not activated (commitments related to 12- and 24-month inspection reports).

The commitments relating to 12- and 24-month inspections will be addressed in the next audit.

## 4 Conclusion

The reinstatement audit has confirmed a high level of compliance with the WORM Pipeline construction EMP and associated EMPs, providing APA with assurance that environmental management practices are being effectively implemented.

Based on the findings, the Lead Auditor considers APA's field environmental management to align with best practice standards. An over-arching finding of this audit is the poor wording of many of the commitments, which fail to meet the SMART criteria and made this compliance audit extremely difficult to undertake and caused delays in the audit process.

## Appendix A

| Plan                                                             | Document Number                           |
|------------------------------------------------------------------|-------------------------------------------|
| Rehabilitation and Reinstatement Procedure                       | 18035-PR-HSE-0005, Rev , dated 15/02/24   |
| APA Construction Environment Management Plan                     | 18035-PL-HSE-0004, Rev 13, dated May 2024 |
| WASCO Construction Environmental Management Plan                 | 18035-PL-HSE-0023, Rev D, dated 14/02/23  |
| Jacksons Creek Site Specific Environmental Management Plan       | 18035-PL-HSE-0027, Rev 1, dated 15/11/22  |
| Jacksons Creek Rehabilitation Plan                               | Rev C                                     |
| Deep Creek Site Specific Environmental Management Plan           | 18035-PL-HSE-0029, Rev 1, dated 15/11/22  |
| Merri Creek Site Specific Environment Management Plan            | 18035-PL-HSE-0028, Rev 1, dated 28/11/22  |
| Conservation Area 28 B Site Specific Environment Management Plan | 18035-PL-HSE-0031, Rev 0 dated 3/11/22    |
| Minor Watercourse Crossing Procedure                             | 18035-PP-L-0064, Rev C, dated 6/10/22     |
| Site Rehabilitation Plan – Property 1/PS733045                   | 18035-PL-HSE-0032, Rev B, dated 15/07/24  |
| Tree Management Plan                                             | 18035-PL-HSE-0016, Rev 1, dated 27/10/22  |
| FAUNA MANAGEMENT PLAN                                            | 18035-PL-LH-0094, Rev 1, dated 1/09/22    |
| WORM Primary Erosion and Sediment Control Plan                   | 18035-PL-HSE-0017, Rev B, dated 4/11/22   |
| Sodic And Dispersive Soil Management Plan                        | 18035-PL-CN-0011, Rev 0, dated 16/07/24   |

[illegible]

Overview of compliance against the various EMPs

| EMP                             | Acceptable   | Major non-conformance | Minor non-conformance | Observation  | Opp for Improvement | Not applicable | Findings      |
|---------------------------------|--------------|-----------------------|-----------------------|--------------|---------------------|----------------|---------------|
| Reinstatement & Rehab Procedure | 63           | 0                     | 0                     | 9            | 4                   | 2              | 78            |
| APA CEMP                        | 68           | 0                     | 0                     | 3            | 2                   | 10             | 83            |
| Wasco EMP                       | 2            | 0                     | 0                     | 7            | 0                   | 0              | 9             |
| Jacksons Creek SSEMP            | 16           | 0                     | 0                     | 8            | 0                   | 3              | 27            |
| Merri Creek SSEMP               | 42           | 0                     | 0                     | 6            | 3                   | 11             | 62            |
| Deep Creek SSEMP                | 4            | 0                     | 0                     | 4            | 0                   | 0              | 8             |
| Conservation Area 28B           | 25           | 0                     | 0                     | 2            | 3                   | 8              | 38            |
| Property 1 PS733045             | 4            | 0                     | 0                     | 8            | 4                   | 10             | 26            |
| Tree MP                         | 2            | 0                     | 0                     | 0            | 0                   | 1              | 3             |
| Primary Erosion and Sediment Co | 16           | 0                     | 0                     | 3            | 0                   | 1              | 20            |
| Minor watercourse crossing      | 12           | 0                     | 0                     | 19           | 0                   | 1              | 32            |
| Fauna MP                        | 13           | 0                     | 0                     | 0            | 0                   | 0              | 13            |
| Sodic And Dispersive Soil MP    | 13           | 0                     | 0                     | 2            | 0                   | 4              | 19            |
| <b>Total</b>                    | <b>280</b>   | <b>0</b>              | <b>0</b>              | <b>71</b>    | <b>16</b>           | <b>51</b>      | <b>418</b>    |
| <b>Percentage</b>               | <b>67.0%</b> | <b>0.0%</b>           | <b>0.0%</b>           | <b>17.0%</b> | <b>3.8%</b>         | <b>12.2%</b>   | <b>100.0%</b> |

| Definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Category                    |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| Compliant with requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Acceptable                  |
| <ul style="list-style-type: none"> <li>- A complete or near complete absence of a required management system; and/or</li> <li>- Supporting system document is available but the requirements are, to a large degree, not implemented (being followed); and/or</li> <li>- Where the design intent of a management system significantly fails to produce the required results; and/or</li> <li>- Where a number of related minor non-conformances indicates that a management system fails to produce the desired results or control.</li> </ul> | Major non-conformance       |
| Where a non conformance(s) is considered to have only a minor effect on the overall management system.                                                                                                                                                                                                                                                                                                                                                                                                                                         | Minor non-conformance       |
| The auditor has observed an area that appeared not to conform but could not confirm a non-conformance.                                                                                                                                                                                                                                                                                                                                                                                                                                         | Observation                 |
| A suggestion for improvement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Opportunity for improvement |
| The requirement is not applicable in this instance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Not applicable              |

|  <b>PRELIMINARY DRAFT WORM COMMITMENTS REGISTER (based on Reinstatement and Rehabilitation Procedure Rev1 dated: 15/02/24 )</b> |                                 |                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                         |             |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|-------------|
| Document Section                                                                                                                                                                                                 | Title                           | Extract                                                                                                                                                                                                                                                                   | Aventus audit notes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Document reference                                                                                                      | Finding     |
| 5                                                                                                                                                                                                                | REINSTATEMENT OBLIGATIONS       | Reinstatement will be undertaken in accordance with SCA's and APA's CEMP, PMPs and the APGA Code of Environmental Practice to ensure that:                                                                                                                                | Site inspection conducted by SPIECAPAG on 6/09/2023 confirmed topsoil stockpile (circa 20m north of Donnybrook Rd) was ready for placement in access area on finalisation of rehab works (site inspection).                                                                                                                                                                                                                                                                                                                                                                                                                               | SPIECAPAG site inspection 6/9/2023                                                                                      | Acceptable  |
|                                                                                                                                                                                                                  |                                 | Topsoil cover is re-established with no soil inversion and all land and waterways disturbed are returned to a stable condition as soon as possible after construction.                                                                                                    | Site inspection conducted by SPIECAPAG on 7/09/2023 stated topsoil stockpiles were in the area of KP30.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | SPIECAPAG site inspection 7/9/2023                                                                                      |             |
|                                                                                                                                                                                                                  |                                 | Land is returned as close as possible to its previous productivity.                                                                                                                                                                                                       | On the day of the audit, auditors sighted land use returned to pre-construction conditions as close as reasonably practicable with sites such as Property 1 P5733045 and Deep Creek seeing vegetation growth coverage well above 70%. Merri Creek banks were reinstated with pasture grass growth on either side.                                                                                                                                                                                                                                                                                                                         |                                                                                                                         | Acceptable  |
|                                                                                                                                                                                                                  |                                 | Stable landforms are re-established close to original topographic contours.                                                                                                                                                                                               | On the day of the audit, auditors sighted stable landforms with contours being reinstated as close as reasonably practicable to the pre-construction conditions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                         | Acceptable  |
|                                                                                                                                                                                                                  |                                 | Natural drainage patterns are reinstated.                                                                                                                                                                                                                                 | On the day of the audit, auditors sighted no drainage blockages with erosion controls in place at Merri Creek and Jackson Creek. Merri Creek was reinstated to the creek's form either side of the pipeline crossing. Other sites visited were returned to a stable condition.                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                         | Acceptable  |
|                                                                                                                                                                                                                  |                                 | Erosion control measures (e.g., contour banks and diversion berms) are installed in erosion prone areas.                                                                                                                                                                  | Site inspection conducted by SPIECAPAG on 7/09/2023 stated that shallow drainage culvert across RoW were installed at KP 30 with open swale drain terminating at silt / sediment trap. Swale drain sediment trap (circa 20m north of Donnybrook Rd). Accumulated sediment on upstream edge of geotextile.<br>During biodegradable berms in place at Jackson Creek to reduce erosion.                                                                                                                                                                                                                                                      | SPIECAPAG site inspection 7/9/2023                                                                                      | Acceptable  |
|                                                                                                                                                                                                                  |                                 | The environment is reinstated as near as possible to the condition of the surrounding area.                                                                                                                                                                               | Site inspections undertaken by SPIECAPAG confirm the works of HL Landscapes meet the prior to construction condition of sites. Inspections included site images across the locations showing reinstatement and revegetation of sites.<br>During the audit, auditors sighted stable landforms that had been reinstated as close as reasonably practicable to the pre-construction conditions.                                                                                                                                                                                                                                              | SPIECAPAG site inspections between 2023 - 2024                                                                          | Acceptable  |
|                                                                                                                                                                                                                  |                                 | The application of ameliorants to the subgrade and topsoil are applied per the PMPs.                                                                                                                                                                                      | The rehabilitation line list provided by SPIECAPAG outlined the application of ameliorants to the subgrade and topsoil along the pipeline inline with relevant SSEMPs.<br>During the audit, auditors sighted small areas of bare soil were due to livestock grazing.                                                                                                                                                                                                                                                                                                                                                                      | Rehabilitation line list.                                                                                               | Acceptable  |
|                                                                                                                                                                                                                  |                                 | The sowing of suitable pasture / equine seeds and fertiliser are applied per the PMPs.                                                                                                                                                                                    | The rehabilitation line list provided by SPIECAPAG outlined the application seeds and fertiliser are applied inline with relevant SSEMPs.<br>During the audit, auditors sighted no areas of bare soils where seeds and fertiliser was applied other than small areas of bare soil due to livestock grazing.                                                                                                                                                                                                                                                                                                                               | Rehabilitation line list.                                                                                               | Acceptable  |
| 5.1                                                                                                                                                                                                              | CEMP Conditions                 | SCA will undertake reinstatement and rehabilitation in accordance with CEMP conditions.                                                                                                                                                                                   | On the day of the audit, auditors sighted land use had returned to pre-construction uses as close as reasonably practicable with sites such as Property 1 P5733045 and Deep Creek seeing vegetation growth coverage well above 70%. Merri Creek banks have been reinstated with pasture grass growth on either side of the waterway.                                                                                                                                                                                                                                                                                                      |                                                                                                                         | Acceptable  |
| 5.1.1                                                                                                                                                                                                            | CEMP Conditions – Reinstatement | Project activities will be completed sequentially. After backfill and compaction of the trench is completed, waste will be removed from the area and restoration and rehabilitation will commence as soon as practicable unless weather conditions prevent this (EMM R1). | Auditors sighted no waste in areas of rehabilitation on the day of the field audit.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                         | Acceptable  |
|                                                                                                                                                                                                                  |                                 | If weather conditions prevent the prompt reseedling of the activity area / access tracks, then temporary erosion and sediment controls will be put in place until reinstatement seeding can commence (EMM R2).                                                            | The evidence supplied did not contain any information to suggest that weather conditions prevented re-seeding.<br><br>The APA Environmental Advisor confirmed weather conditions did not prevent reseedling efforts of the pipeline construction RoW, however temporary erosion and sediment control measures were biodegradable with auditors sighting the use of erosion barriers at Jackson Creek. At Merri Creek, geofabric material and soil berms were used to prevent erosion along the revegetated banks.<br><br><b>Observation</b><br>Site inspection reports did not outline if weather conditions hampered re-seeding efforts. | Rehabilitation line list.<br>SPIECAPAG 2024 site inspections.                                                           | Observation |
|                                                                                                                                                                                                                  |                                 | Soil inversion must be avoided during respreading of topsoil (EMM R4).                                                                                                                                                                                                    | A sample of site inspection reports noted that topsoil was stored in a way that avoided soil inversion before being re-spread.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | SPIECAPAG site inspection 6/9/2023<br><br>SPIECAPAG site inspection 7/9/2023<br><br>SPIECAPAG site inspection 27/9/2023 | Acceptable  |

|       |                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                 |                             |
|-------|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|-----------------------------|
|       |                                    | Soil surfaces that have been compacted due to construction activities, such as those subject to traffic or storage areas within the construction area, must be ripped to allow the topsoil to bind with the subsoil and increase water filtration (EMM R5) with the exception of Striped Legless Lizard (SLL) and Golden Sun Moth (GSM) habitat which shall not be ripped. Refer to the Environmental Line List (EEL) for SLL and GSM habitat (Appendix A). | On the day of the audit, auditors sighted evidence of ripping at various locations where applicable in line the Rehabilitation Line List supplied by APA. Various site inspections conducted by SPIECAPAG between 2023 - 2024 display ripping, vegetation growth on areas where ripping occurred and confirmation that no soil ripping occurred in SLL and GSM habitats.                                                                                                                                                         | SPIECAPAG site inspections between 2023 - 2024<br><br>Rehabilitation line list. | Acceptable                  |
|       |                                    | Following completion of reinstatement, agreement must be sought from landowners (and occupiers, managers, or government agencies as applicable) of the satisfaction of the reinstatement work as required by conditions of the Pipelines Licence (EMM R7).                                                                                                                                                                                                  | Various landowner handover forms were sighted confirming that landowners signed off on completion of reinstatement.                                                                                                                                                                                                                                                                                                                                                                                                              | Landowner handover records.                                                     | Acceptable                  |
|       |                                    | Reinstatement will be undertaken in accordance with Landowner agreements (Landholder requirements within PMPs) required under the Pipeline Licence (EMM R9).                                                                                                                                                                                                                                                                                                | The APA Environmental Advisor stated that the sites visited were rehabilitated in accordance with the landowner engagement.<br>A sample of handover forms confirm that landowners signed off on reinstatement.                                                                                                                                                                                                                                                                                                                   | Landowner handover records.                                                     | Acceptable                  |
| 5.1.2 | CEMP Conditions – Rehabilitation   | The construction area must be rehabilitated to pre-existing contours with natural drainage lines restored and protected if required. Where required, seeding, soil conditioning of disturbed areas must be undertaken as part of the reinstatement activities (EMM R3).                                                                                                                                                                                     | During the audit, auditors sighted land use had returned to pre-construction uses as close as reasonably practicable (based on landforms and land use adjacent to the former construction RoW), with sites such as Property 1 P5733045 and Deep Creek seeing vegetation growth coverage well above 70%. Merri Creek banks have been reinstated with pasture grass growth on either side.                                                                                                                                         |                                                                                 | Acceptable                  |
|       |                                    | Targeted control of weeds must be undertaken by a qualified pest plant control contractor to ensure that the construction area does not have an increased density and distribution of noxious and agricultural weeds relative to adjacent areas (EMM R6).                                                                                                                                                                                                   | Weed invoices confirm weed control has occurred along the pipeline between 28/3/2024 and 23/6/2024.<br>During the audit, auditors sighted minimal weed coverage across the sections of the reinstated easement inspected.                                                                                                                                                                                                                                                                                                        | HL Landscapes June weed invoices                                                | Acceptable                  |
|       |                                    | Following the completion of reinstatement activities, the construction area must be monitored for a period of 12-24 months to ensure the land is stable and consistent with adjacent areas.<br>Any defects from construction must be rectified during this time and following this period any residual environmental issues must be addressed through the APA's Operating Environmental Management Plan (EMM R8)                                            | During the audit, auditors sighted land use had returned to pre-construction uses as close as reasonably practicable (based on landforms and land use adjacent to the former construction RoW), with sites such as Property 1 P5733045 and Deep Creek seeing vegetation growth coverage well above 70%. Merri Creek banks have been reinstated with pasture grass growth on either side.<br>The APA Environmental Advisor informed the auditors that monitoring has been confirmed to continue for 24 months post-reinstatement. |                                                                                 | Acceptable                  |
| 6     | Reinstatement over existing assets | When operating machinery, or penetrating the ground around existing APA pipelines, follow all relevant APA Permit to Work systems, SWMS, operating procedures and guidelines.                                                                                                                                                                                                                                                                               | This condition is not possible to audit because the auditors do not know what the 'relevant' PTW, SWMS, operating procedures and guidelines are. This would an audit within an audit.<br><br><b>OFI</b><br>Wording of future EMPs should be tightened to meet the SMART criteria.                                                                                                                                                                                                                                                |                                                                                 | Opportunity for improvement |
| 7.1   | Activity Area / Access Tracks      | The pipeline trench will be compacted per required specification and 'crowned' to prevent water pooling or travelling down the trench line.                                                                                                                                                                                                                                                                                                                 | The SPIECAPAG inspection reports sighted by the auditors do not mention anything about trench crowns. The auditors noted that there were no areas of water pooling or travelling along the trench line.<br><br><b>OFI:</b><br>Site inspections proforma contains no prompt regarding inspection of trench crowns.                                                                                                                                                                                                                |                                                                                 | Opportunity for improvement |
|       |                                    | The construction activity area / access tracks (where required) will be returned to its existing contours and areas heavily compacted by construction will be ripped to ameliorate soils and allow better water infiltration (exception: SLL and GSM habitat not to be ripped and must be made visible to machinery operators e.g. flagging, signage erected on the activity area / access tracks within SLL and GSM habitat areas (Appendix A)).           | Auditors sighted land use has returned to pre-construction uses as close as reasonably practicable. In accordance with the rehabilitation line list supplied by SPIECAPAG, the SLL and GSM habitats were not ripped.<br><br>Inspections conducted by SPIECAPAG display photographic evidence of ripping of the soil where construction has occurred at various locations including Conservation Area 28B, Merri Creek, Jackson Creek and Property 1 P5733045.                                                                    | SPIECAPAG site inspections between 2023 - 2024                                  | Acceptable                  |
|       |                                    | Activity area / access track(s) reinstatement and rehabilitation to manage stability and fertility will generally include:<br><br>• Compaction and capping of the pipeline trench.                                                                                                                                                                                                                                                                          | During the audit, auditors sighted land use had returned to pre-construction uses as close as reasonably practicable (based on landforms and land use adjacent to the former construction RoW).                                                                                                                                                                                                                                                                                                                                  |                                                                                 | Acceptable                  |
|       |                                    | • Spreading and re-shaping any remaining subsoils over the activity area / access tracks to match in with the surrounding contours.                                                                                                                                                                                                                                                                                                                         | During the audit, auditors sighted land use had returned to pre-construction uses as close as reasonably practicable (based on landforms and land use adjacent to the former construction RoW).                                                                                                                                                                                                                                                                                                                                  |                                                                                 | Acceptable                  |

|     |                       |                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                            |            |
|-----|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|------------|
|     |                       | <ul style="list-style-type: none"> <li>• Ripping the activity area / access tracks in compacted areas. The ripping depth will be confirmed with APA and SCA Construction Manager onsite. Cultural heritage areas will not be ripped without APA approval. No ripping will be undertaken in SLL and GSM habitat (refer to Appendix A for SLL and GSM habitat locations).</li> </ul>                              | Auditors sighted ripping at various locations where applicable. Records verify that SLL and GSM habitat locations were not ripped. Rehabilitation line list supplied by SPIECAPAG outlined areas of SLL and GSM and confirmed no ripping.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | SPIECAPAG site inspections between 2023 - 2024<br>Rehabilitation line list | Acceptable |
|     |                       | <ul style="list-style-type: none"> <li>• Applying gypsum to the activity area / access tracks subsoil at an application rate of 2 tonnes / ha.</li> </ul>                                                                                                                                                                                                                                                       | The rehabilitation line list outlined the application locations of gypsum at a rate of 2 tonnes / ha to subsoil along the pipeline inline with relevant SSEMPs. During the audit, auditors sighted small areas of bare soil due to livestock grazing.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Rehabilitation line list                                                   | Acceptable |
|     |                       | <ul style="list-style-type: none"> <li>• Respreading of topsoil across all disturbed areas of the activity area/access tracks with the aim to, where practical, respread topsoil in same area it was originally stripped from.</li> </ul>                                                                                                                                                                       | Site inspections conducted by SPIECAPAG include images displaying the respreading of topsoil across all disturbed areas of the activity area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                            | Acceptable |
|     |                       | <ul style="list-style-type: none"> <li>• Applying lime to topsoil at an application rate of 2 tonnes / ha.</li> </ul>                                                                                                                                                                                                                                                                                           | The supplied rehabilitation line list confirmed the addition of lime at a rate of 2 T/ha along the pipeline. Site inspection performed by SPIECAPAG confirms lime spreading had occurred between KP 28 - 50 by 9/5/2024.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Rehabilitation line list<br>SPIECAPAG site inspection 9/5/2024             | Acceptable |
|     |                       | <ul style="list-style-type: none"> <li>• Sowing of seed and fertiliser into the activity area / access tracks per PMP or site-specific environmental management plan requirements. Native seed (native seed mix per Site Rehabilitation Plan – Property 1/PS733045) to be sown at KP 22.60 – KP 22.86.</li> </ul>                                                                                               | During the audit, auditors sighted rehabilitation across Property 1/PS733045 however, surrounding area is pasture. Native grasses were not used, the use of pasture mix for livestock was used matching the surrounding area. Rehabilitation of topsoil showed ground cover above 70%. The rehabilitation line list supplied outlined the seed and fertiliser amounts. Other sites sighted by auditors were vegetated with SPIECAPAG confirming sites were rehabilitated in accordance with SSEMPs.                                                                                                                                                                                                                                                       | Rehabilitation line list                                                   | Acceptable |
| 7.2 | Watercourse Crossings | Watercourses will be reinstated and rehabilitated as soon as practicable.                                                                                                                                                                                                                                                                                                                                       | The only watercourse that auditors visited that was reinstated was Merri Creek. Waterway planting occurred within Merri Creek's low flow channel by HL Landscapes during May 2024 where 125 m2 of 50 mm virotube at 4 plants per m2 were planted. Embankment planting along Merri Creek in May 2024 by HL Landscapes where 600m2 of 50mm Virotube at 6 plants per m2, excluding soil was planted & 700 gsm slitted jute matting were placed.                                                                                                                                                                                                                                                                                                              | HL Landscapes records                                                      | Acceptable |
|     |                       | Access tracks across watercourses will be removed as soon as they are no longer needed by construction.                                                                                                                                                                                                                                                                                                         | During the audit, auditors sighted Merri Creek. Site inspection conducted 28/2/2024 and 29/2/2024 by SPIECAPAG photograph the removal of the waterway crossing at Merri Creek with the audit inspection showing Merri Creek reinstated as per the Merri Creek SSEMP.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | SPIECAPAG site inspections 28/2/2024, 29/2/2024                            | Acceptable |
|     |                       | Merri Creek is to be reinstated as per Merri Creek Site Specific Environmental Management Plan.                                                                                                                                                                                                                                                                                                                 | During the audit, auditors sighted Merri Creek stabilisation has occurred with rocks lining the banks of the creek in line with the Merri Creek SSEMP. Rehabilitation of vegetation growth has occurred with some tubestock along the creek banks being affected by wildlife. APA confirmed further tubestock planting will occur. Waterway planting occurred within Merri Creek's low flow channel by HL Landscapes within May 2024. 125 m2 of 50 mm virotube at 4 plants per m2 were planted. Emabankment planting along Merri Creek in May 2024 by HL Landscapes. 600 m2 of 50 mm Virotube @ 6 plants per m2, excluding soil was planted & 700 gsm slitted jute matting were placed. HL Landscapes stated there will be a 12 month maintenance period. | HL Landscapes records                                                      | Acceptable |
|     |                       | Minor watercourse crossings will generally involve:<br>• Bed and banks of watercourses will be reinstated to pre-disturbance conditions.                                                                                                                                                                                                                                                                        | As per row above regarding Merri Creek.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | HL Landscapes records                                                      | Acceptable |
|     |                       | • Active revegetation of watercourse banks will be considered to minimise vegetation fragmentation and assist in rapid stabilisation.                                                                                                                                                                                                                                                                           | As per row above regarding Merri Creek.<br><br>On the day of the audit, auditors sighted the tributary at Jackson creek was reconstructed as close as reasonably practicable to pre-construction conditions with several staked in coir logs remain in place in this area. APA advised that these would remain in place as they are biodegradable.                                                                                                                                                                                                                                                                                                                                                                                                        | HL Landscapes records                                                      | Acceptable |
|     |                       | • Permanent drainage controls (diversion berms) will be installed at intervals (agreed between the APA and SCA Construction Managers) with long and/or steep slopes along the activity area / access tracks and at approaches to watercourses to avoid water flowing down the activity area / access tracks causing scour and flowing into watercourses resulting in erosion and sedimentation of watercourses. | During the audit, auditors sighted reinstated creek banks at Merri Creek with soil berms in place to control surface water flows. The tributary at Jackson creek was reconstructed as close as reasonably practicable to pre-construction conditions, with several coir logs staked in place in this area. The APA Environmental Advisor advised that these would remain in place as they are biodegradable.                                                                                                                                                                                                                                                                                                                                              |                                                                            | Acceptable |

|     |                                        |                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                          |                             |
|-----|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-----------------------------|
|     |                                        | <ul style="list-style-type: none"> <li>• Jute matt or plantings such as <i>Lomandra longifolia</i> may be used to stabilise banks where high risks of erosion exist.</li> </ul>                                                                                                                                                                          | Auditors sighted jutt matts were used along the banks of Merri Creek, rocks were placed along the banks to prevent erosion with rock rip rap within the creek. <i>Poa</i> and <i>Lomandra</i> grasses had been planted along the banks in between rock placements to reduce the risk of erosion.                                                                                         |                                                                                                          | Acceptable                  |
|     |                                        | <ul style="list-style-type: none"> <li>• Weed control and watering per the Minor Watercourse Crossing Procedure (i.e. periodic watering).</li> </ul>                                                                                                                                                                                                     | <p>Weed invoices supplied by SPIECAPAG confirm weed control has occurred along the pipeline between 28/3/2024 and 23/6/2024.</p> <p><b>Observation</b><br/>Watering records were not sighted. Site inspections reports do not contain any prompts regarding watering, therefore compliance with this condition cannot be assessed.</p>                                                   | HL Landscapes June weed invoices                                                                         | Observation                 |
| 7.3 | Access Tracks and other Infrastructure | Temporary fences and gates will be removed from the activity area / access tracks during reinstatement.                                                                                                                                                                                                                                                  | <p>Site inspections conducted by SPIECAPAG throughout 2024 show the use of temporary fencing surrounding Cultural Heritage Sites.</p> <p>On the day of the audit, the APA Environmental Advisor explained that temporary fencing remains in place at the request of the landowner at Property 1 PS733045.</p>                                                                            | SPIECAPAG site inspections 2024                                                                          | Acceptable                  |
|     |                                        | Access tracks, fences, cattle grids etc. will be reinstated / built per PMP agreements. Permanent activity area / access tracks fence gates will be installed in accordance with PMP requirements and will be constructed in accordance with APA design drawings.                                                                                        | On the day of the audit, auditors noted that temporary access tracks had been rehabilitated. Permanent fences and gates were sighted along the pipeline at various locations including: Merri Creek, Deep Creek, Property 1 PS733045 and Conservation area 28B                                                                                                                           |                                                                                                          | Acceptable                  |
| 7.4 | Erosion and Sediment Control           | Site Rehabilitation shall be conducted in accordance with the Project's Reinstatement and Rehabilitation Procedure within SCA's CEMP which complies with the reinstatement requirements of the Property Management Plans.                                                                                                                                | During the audit, auditors sighted various locations aligning with the reinstatement and rehabilitation procedure and the relevant SSEMP's.                                                                                                                                                                                                                                              |                                                                                                          | Acceptable                  |
|     |                                        | Watercourse crossings will be reinstated as soon as construction of crossing is complete to minimise duration of disturbance and the watercourse profile will be reinstated back to pre-disturbance profile as far as reasonably practical. Levels will be taken prior to disturbance and after reinstatement to ensure bed and bank profile is correct. | A letter from LandPartners states that land levels were surveyed prior to the commencement of construction, and a follow-up survey was conducted confirming the required specifications and tolerances were met.                                                                                                                                                                         | LandPartners letter signed by Cameron Sly (Project Director) on 19/2/2024                                | Acceptable                  |
|     |                                        | Environmental audits will check reinstated areas and post-reinstatement inspection at watercourse crossings to confirm that reinstatement is as per procedure prior to marking area as no-go zone and restricting access.                                                                                                                                | During the audit, auditors sighted re-established areas confirming reinstatement is as per the SSEMP.                                                                                                                                                                                                                                                                                    | APA WORM rehabilitation audit report (Excel spreadsheet)                                                 | Acceptable                  |
|     |                                        | Areas where protected species habitat exist (e.g., Golden Sun Moth, Striped Legless Lizard and Growling Grass Frog) should be reinstated and rehabilitated as soon as reasonably practicable after construction.                                                                                                                                         | The supplied rehabilitation line list confirmed the KP areas where protected species habitats occur. Reinstatement of these areas were confirmed through the weekly, fortnightly and monthly inspections conducted by SPIECAPAG and display images showing reinstatement progression between 2023 and 2024.                                                                              | Rehabilitation line list                                                                                 | Acceptable                  |
|     |                                        | All material removed from a sediment control device during maintenance or decommissioning, whether solid or liquid, must be disposed of in a manner that does not cause ongoing soil                                                                                                                                                                     | Site inspection reports by SPIECAPAG do not contain prompts regarding removal of material removal from sediment control devices.                                                                                                                                                                                                                                                         | SPIECAPAG site inspections in 2024.                                                                      | Opportunity for improvement |
|     |                                        | Site spoil must be lawfully disposed of in a manner that does not result in ongoing soil erosion or environmental harm.                                                                                                                                                                                                                                  | As above.                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                          | Opportunity for improvement |
|     |                                        | Temporary erosion and sediment control shall remain in place until 80% cover has been achieved by rehabilitation or permanent works.                                                                                                                                                                                                                     | The Environmental Advisor confirming the temporary erosion and sediment controls will remain in place past 80% due to them being biodegradable.                                                                                                                                                                                                                                          |                                                                                                          | Acceptable                  |
| 7.5 | Corridor Maintenance                   | Permanent fences and gates will be installed on completion of SCA construction works as part of the re-instatement activities. All permanent fences will be installed in accordance with the relevant drawings and the agreements made with the relevant landowner. Gates will be installed where agreed with landowner/occupiers.                       | During the audit, auditors sighted gates and fencing along the pipeline in place. Site inspection conducted on 1/8/2024 by SPIECAPAG stated Jackson Creek was reinstated in accordance with the SSEMP however, fencing and sowing of creek areas to be complied with after marker-post installation works, this takes into account any further disturbance of the area from these works. | SPIECAPAG site inspection 1/8/2024                                                                       | Acceptable                  |
|     |                                        | The restored fencing will be constructed with new materials of the same type and like for like, i.e., "Hingelock" fencing must not be used to replace "Ringlock" fencing. In all cases the restored fencing must be to a quality no less than what originally existed prior to the Works.                                                                | During the audit, auditors were briefed by the APA Environmental Advisor about a temporary fence that was there during construction, which was replaced with a low stone wall near Conservation Area 28B (KP 48.6). Site inspections undertaken by SPIECAPAG throughout 2023 and 2024 confirm the use of temporary fencing at various sites along the pipeline.                          | SPIECAPAG site inspections between 2023 - 2024.<br><br>Land Owner Sign Off Register provided on 4/9/2024 | Acceptable                  |
|     |                                        | The property owner or occupier will be consulted to ensure they are reasonably satisfied prior to final sign-off on re-instatement. All temporary fencing and material left over from installation of permanent fencing shall be removed from the right of way on completion of the works.                                                               | During the audit, auditors visited Jackson Creek and Property 1PS733045, with the sign off register confirming various sites handed back to the land owners. The APA Environmental Advisor indicated that various landowners asked to keep temporary fencing in place.                                                                                                                   | Land Owner Sign Off Register provided on 4/9/2024                                                        | Acceptable                  |

|       |                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                 |                                |
|-------|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|--------------------------------|
| 7.6   | Weed Management        | Weed inspections will occur along the activity area / access tracks in autumn and spring during the defects liability period. Where the germination of weeds is identified as sufficient to delay restoration of pasture production or where the weeds have been found to have an increased density on the activity area / access tracks compared to the surrounding environment, an appropriately licensed and experienced Weed Management Contractor will be engaged.    | Weed invoices supplied by SPIECAPAG confirm weed control has occurred along the pipeline between 28/3/2024 and 23/6/2024.<br><br>Site inspections conducted by SPIECAPAG between 2023 - 2024 include weed germination coverage. Site inspections confirm the weed coverage is less than the surrounding area. Site inspections conducted on 9/5/2024 and 16/5/2024 confirm the weed control along the pipeline between 36.9 to 38.8, 39 to 50.                                                                                                                                                                                                                                                | SPIECAPAG weed invoices                                                                                         | Acceptable                     |
| 7.7   | Cultural Heritage      | All reinstatement and rehabilitation works must be contained to the activity area / access tracks as per requirements of CEMP and CHMPs. Controls may be implemented to ensure compliance where deemed necessary:<br><br>All members of the reinstatement and rehabilitation crew must have completed the Biosis / Wurundjeri Project Induction before beginning works. The induction will reinforce the requirements stipulated in the Cultural Heritage Management Plan. | All reinstatement and rehabilitation works were contained to the activity area with site inspections conducted on 4/8/2023, 7/8/2023, 8/8/2023 and 9/8/2023 outlined the use of markers and fencing to protect cultural heritage areas.<br><br>Induction records sited (26/06/2023) showing the completion of CH induction.                                                                                                                                                                                                                                                                                                                                                                   | SPIECAPAG site inspections:<br>4/8/2023<br>7/8/2023<br>8/8/2023<br>9/8/2023<br><br>Induction records 26/06/2023 | Acceptable                     |
|       |                        | Prior to commencement of topsoil respreading activities survey of corridor marker pegs advanced of the works will be undertaken to ensure the activity area / access tracks are clearly delineated such that the potential for deviation from the designated alignment is minimised.                                                                                                                                                                                       | During the audit, auditors sighted pegs were still in place in some areas, with the APA Environmental Advisor confirming they will remain in place until the end of the rehabilitation timeline (which ends in February 2026).<br><br>SPIECAPAG site inspections dated 4/8/2023, 7/8/2023, 8/8/2023 and 9/8/2023 outlined the use of marker pegs and fencing to protect cultural heritage areas.                                                                                                                                                                                                                                                                                              | SPIECAPAG site inspections:<br>4/8/2023<br>7/8/2023<br>8/8/2023<br>9/8/2024                                     | Acceptable                     |
|       |                        | Monitoring will be undertaken during reinstatement and rehabilitation to confirm:<br><br>• Personnel have appropriately completed the Cultural Induction.                                                                                                                                                                                                                                                                                                                  | Induction records supplied by Paddock Solutions confirm cultural heritage induction was completed on 3/05/2024<br><br>Site inspection conducted on 4/08/2023 at Deep Creek confirmed fencing, konagaderra bog mats and fence signage in place.                                                                                                                                                                                                                                                                                                                                                                                                                                                | Induction records 3/05/2024                                                                                     | Acceptable                     |
|       |                        | • The survey crew has marked ahead of the work front to ensure operators have a clear understanding and sight of the activity area / access tracks, including for example:<br>o Coloured survey pegs and/or flagging tape to improve visibility.<br>o Additional high visibility flagging if markers cannot be clearly identified.                                                                                                                                         | Site inspections supplied by SPIECAPAG confirm the use of pegs to mark the RoW.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | SPIECAPAG site inspection 2023 - 2024.                                                                          | Acceptable                     |
|       |                        | • A checklist is included in pre-start meetings, mandating sign off on survey and cultural heritage controls in place.                                                                                                                                                                                                                                                                                                                                                     | No evidence was sighted regarding sign off of pre-start meetings on this topic.<br><br>Despite this, SPIECAPAG site inspections during 2024 confirm cultural heritage controls were in place.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | SPIECAPAG site inspection in 2024.                                                                              | Observation                    |
|       |                        | • Site/issue specific toolbox talks are attended by the reinstatement and rehabilitation crew.                                                                                                                                                                                                                                                                                                                                                                             | Toolbox talk conducted by SPIECAPAG on 27/6/2023 outlined the cultural heritage management requirements of the pipeline works.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | SPIECAPAG tool box talk 3/5/2024                                                                                | Acceptable                     |
|       |                        | • Targeted inspections/audits will occur where work is being undertaken.                                                                                                                                                                                                                                                                                                                                                                                                   | An audit conducted by Aventus in conjunction with the APA Environmental Advisor on the 22/10/2024.<br>SPIECAPAG site inspections were undertaken between 2023 - 2024 where works were completed along the pipeline.                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | SPIECAPAG site inspection 2023 - 2024<br><br>Audit report.                                                      | Acceptable                     |
| 7.8.1 | Scheduling Parameters  | Rehabilitation and reinstatement works will be undertaken on a progressive basis following:<br>• Successful quality assurance testing, such as hydrotesting, of the pipeline after placement, backfill and compaction, and<br><br>• Cultural heritage clearance from the relevant authorities, where applicable.                                                                                                                                                           | The hydrostatic test report confirmed a successful hydrotest of the pipeline between KP 18-36.<br><br>Images from SPIECAPAG site inspections between 2023 - 2024 confirm the KP's tested have been backfilled and tested.<br><br>The approval of the 3 CHMPs confirm clearance, furthermore the cultural heritage induction conducted on 3/05/2024 outlined the cultural heritage management requirements of the project.                                                                                                                                                                                                                                                                     | Hydrostatic test report (SPIECAPAG and Axs), dated 6/06/2023<br><br>SPIECAPAG tool box talk 3/5/2024            | Acceptable<br><br>Acceptable   |
| 7.8.2 | Delayed Rehabilitation | The rehabilitation procedure to be implemented should works be prevented as a result of weather or ground conditions is provided below.<br><br>Interim Period<br><br>• Landowners will be advised of any delays to rehabilitation commencement and management measures (i.e. ESC measures)<br>• Reinstatement methodology and sequencing explained to landowners, including how amelioration, topsoil respreading and seeding/fertilising will be undertaken.              | No evidence was sighted to indicate that APA or SPIECAPAG provided landowners with information regarding delays to rehabilitation.<br>Auditors sighted the Xinfo communications database and it is expected that delays to rehabilitation would be included in these records. However, the auditors had not sighted this level of detail.<br><br>No evidence was sighted to indicate that APA or SPIECAPAG provided landowners with information regarding reinstatement methodologies.<br>Auditors sighted the Xinfo communications database and it is expected that delays to rehabilitation would be included in these records. However, the auditors had not sighted this level of detail. | Xinfo communication database<br><br>Xinfo communication database                                                | Observation<br><br>Observation |

|   |                                              |                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                               |                |
|---|----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|----------------|
|   |                                              | • Fortnightly inspections of the activity area / access tracks and ESC, including Joint APA/SCA Inspections of subgrade condition.                                                                                                                                                                                                                                                                 | SPIECAPAG have provided various weekly, fortnightly and monthly site inspections from the rehabilitation and reinstatement phase of the project between 2023 and 2024 at construction sites with photographic evidence showing progressive reinstatement of activity areas and access tracks.                                                                                                                                                                                                                      | SPIECAPAG site inspections 2023 - 2024.                                       | Acceptable     |
|   |                                              | • Maintain and manage landowner corridor access to the activity area / access tracks, to allow for livestock movement.                                                                                                                                                                                                                                                                             | Site inspections conducted by SPIECAPAG confirmed access tracks were well maintained during construction.                                                                                                                                                                                                                                                                                                                                                                                                          | SPIECAPAG site inspections 2023 - 2024.                                       | Acceptable     |
|   |                                              | • SCA Land Liaison representative to attend landowner concerns/defects.                                                                                                                                                                                                                                                                                                                            | During the audit, auditors noted that access tracks had been rehabilitated.<br>The APA Environmental Advisor met with the auditors on 6/8/2025 to demonstrate the APA communications system (Xinfo) so the auditors could sight landowner records. Auditors took a sampled approach viewing complaints, discussion records and completed landowner sign off sheets for properties at KP 10.139, 10.539 and 11.166.                                                                                                 | Xinfo communications database                                                 | Acceptable     |
|   |                                              | • SCA will keep a register record agreements and discussion with landowners as well as specific requirements, progress and timing of rehabilitation.                                                                                                                                                                                                                                               | As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                               | Acceptable     |
|   |                                              | Topsoil                                                                                                                                                                                                                                                                                                                                                                                            | Auditors sighted land use has returned to pre-construction uses as close as reasonably practicable, as previously noted.                                                                                                                                                                                                                                                                                                                                                                                           | SPIECAPAG site inspection reports 2024.                                       | Acceptable     |
|   |                                              | • Topsoil spreading will occur when appropriate subgrade ground conditions permit, as assessed by Joint Inspection.                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                               |                |
| 8 | Monitoring, reporting and corrective actions | Monitoring during reinstatement and rehabilitation will be recorded in Daily Environment Inspections.                                                                                                                                                                                                                                                                                              | SPIECAPAG have provided various site inspections from the rehabilitation and reinstatement phase of the project in 2024.                                                                                                                                                                                                                                                                                                                                                                                           | Various SPIECAPAG site inspections reports for 2024.                          | Acceptable     |
|   |                                              | The following items will be monitored and reported on during reinstatement and rehabilitation:<br>• Ground levels are to be taken prior to disturbance and after reinstatement to ensure landform contours are correct.                                                                                                                                                                            | Land levels were surveyed prior to the commencement of construction, and a follow-up survey was conducted upon completion. A letter from LandPartners, confirming that the final land level survey has taken place (19/2/2024).                                                                                                                                                                                                                                                                                    |                                                                               | Acceptable     |
|   |                                              | • Post-reinstatement inspection of the activity area / access tracks to confirm that reinstatement is as per procedure prior to marking area as no-go zone and restricting access.                                                                                                                                                                                                                 | Inspections conducted by SPIECAPAG include photographic evidence of access track reinstatement. The APA Environmental Advisor confirmed that the track on the western side of Jackson Creek was reinstated prior to construction. The APA environmental advisor confirmed the access track was then upgraded to address frac outs and remained in place upon the land owner's request.                                                                                                                             | SPIECAPAG site inspections 2023 - 2024.                                       | Acceptable     |
|   |                                              | • Environmental audits will check reinstated areas.                                                                                                                                                                                                                                                                                                                                                | Construction and rehabilitation audits conducted by Giulio Pinzone at Aventus Consulting (Exemplar Global-certified auditor 129371).                                                                                                                                                                                                                                                                                                                                                                               | Audit reports                                                                 | Acceptable     |
|   |                                              | • At minimum, an inspection once a week of disturbed and reinstated areas during construction.                                                                                                                                                                                                                                                                                                     | Site inspections conducted by SPIECAPAG throughout the reinstatement and rehabilitation period were conducted weekly.                                                                                                                                                                                                                                                                                                                                                                                              | SPIECAPAG site inspections 2023 - 2024.                                       | Acceptable     |
|   |                                              | • Final reinstatement inspection prior to handover to APA.                                                                                                                                                                                                                                                                                                                                         | To be completed after the completion of the 24-month post-construction period (end in February 2026).                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                               | Not applicable |
|   |                                              | • Post-reinstatement inspection at watercourse crossings to confirm that reinstatement is as per procedure prior to marking area as no-go zone and restricting access.                                                                                                                                                                                                                             | To be completed after the completion of the 24-month post-construction period (end in February 2026).                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                               | Not applicable |
|   |                                              | • Levels taken prior to disturbance and after reinstatement to ensure bed and bank profile is correct.                                                                                                                                                                                                                                                                                             | A letter from LandPartners states that land levels were surveyed prior to the commencement of construction, and a follow-up survey was conducted confirming the required specifications and tolerances were met.                                                                                                                                                                                                                                                                                                   | LandPartners letter signed by Cameron Sly (Project Director) on 19/2/2024     | Acceptable     |
|   |                                              | • Post-reinstatement walkthrough with APA of the activity area / access tracks, watercourse crossings and temporary infrastructure to confirm that reinstatement is as per procedure prior to marking area as no-go zone and restricting access.                                                                                                                                                   | Site inspection reports by SPIECAPAG do not contain information that makes it possible to assess against this commitment.                                                                                                                                                                                                                                                                                                                                                                                          |                                                                               | Observation    |
|   |                                              | On completion of reinstatement (including fencing, gates etc.) APA will organise an environmental audit with an agronomist to undertake an assessment of rehabilitation and sign off on it being satisfactorily completed. APA and SCA will then use all reasonable endeavours to obtain a signed release from Landholders to confirm that reinstatement works have been completed satisfactorily. | Site inspections (23/7/2024 and 25/9/2024) provided by an agronomist confirms a section of easement (130m long) was acceptable before sign off to land owner.<br>Various landowner sign offs were provided by the APA Environmental Advisor.<br><br><b>Observation</b><br>1. The July report covers 130 m.<br>2. The September does not indicate KPs surveyed and is far too brief.<br>3. Agronomists name, qualifications are not on the reports, therefore cannot confirm if the reports are from an agronomist. | Landowner handover records<br><br>Agronomist inspections 23/7/2024, 25/9/2024 | Observation    |

|     |                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                        |                              |             |
|-----|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------|
| 8.1 | Corrective Actions     | <p>While no material is permitted to leave the activity area / access tracks, if any material does, the following procedure will be followed for rectification:</p> <p>1. Advise SCA supervisor immediately. The supervisor must notify our Environmental team as soon as practicable of any exceedance that has occurred as they will need to notify APA as per the requirements of the CHMP and will be raised as an environmental incident per the CEMP.</p> <p>2. The overspilled material should be returned to the activity area / access tracks as soon as possible.</p> <p>3. When returning overspill material, try to not scrape the existing ground where the material has left the activity area / access tracks. Keep a 'ground clearance' (e.g 100mm) to minimise further ground disturbance. While this may be challenging in areas where rocks have fallen off the activity area / access tracks, the removal of topsoil during scrapping activities will be minimised as much as practicable.</p> <p>4. Use a 'spotter' (when necessary) to guide the operator to ensure ground clearance is achieved.</p> <p>5. Ensure that machinery involved in rectification works do so from the activity area / access tracks; however the remainder of the plant must stay on the activity area / access tracks to prevent tracking.</p> <p>6. The SCA environmental team will liaise with APA to arrange a cultural heritage inspection of the area exceeded.</p> | <p>The APA Environmental Advisor confirmed no material left sites, outlining that soil was stored and reused at site.</p> <p><b>Observation</b><br/>Evidence to support the Environmental Advisor has not been sighted by auditors.</p>                                                |                              | Observation |
| 9   | COMMUNICATION CHANNELS | <p>All landholder/landowner communications will be dealt with promptly and efficiently, and in accordance with SCA's Stakeholder Management and Communications Plan.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>Landowner sign off sheet register sighted showing the response actions (meeting notes 27/8/2024) in response to outstanding actions as of 13/8/2024.</p> <p><b>Observation</b><br/>The use of the words 'promptly and efficiently' is not auditable, because it is not defined.</p> |                              | Observation |
|     |                        | <p>A Complaints Register will also be maintained by the Project's Environment Manager or delegate, and will detail what the issue was, initial response provided and how and when the issue was resolved, and by whom.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>The complaints register for the WORM pipeline was provided outlining the reflective measures implemented and the preventative measures to further reduce the likelihood of a re-occurring complaint. Various complaints were closed out throughout 2022 and 2023 by SPIECAPAG.</p>  | Supplied complaints register | Acceptable  |

|                             |    |                  |     |
|-----------------------------|----|------------------|-----|
| Acceptable                  | 63 | Percentage Total | 81% |
| Major non-conformance       | 0  |                  | 0%  |
| Minor non-conformance       | 0  |                  | 0%  |
| Observation                 | 9  |                  | 12% |
| Opportunity for improvement | 4  |                  | 5%  |
| Not applicable              | 2  |                  | 3%  |
| Total                       | 78 |                  |     |



PRELIMINARY DRAFT WORM Commitments Register (based on APA CEMP Rev 13, dated May 2024)

| CEMP Section | Title          | Text extract from CEMP                                                                                                                                                | Audit finding                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Document reference                                                                        | Compliant? |
|--------------|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|------------|
| 2.5          | Timelines      | Following completion of construction, a 24-month rehabilitation monitoring period will apply during which any defects will be rectified in accordance with this CEMP. | A 24 month rehabilitation monitoring timeframe is in place (started in February 2024). The audit took place 8 months into this timeframe. Evidence outlined throughout this register and others verifies that monitoring has been taking place.                                                                                                                                                                                                                                                                                                                                                              |                                                                                           | Acceptable |
| 2.8          | Rehabilitation | The rehabilitation of the construction area and temporary facilities and areas will begin as soon as practicable after the completion of construction.                | The APA Environmental Advisor confirmed it was progressive reinstatement after the pipeline was installed with post-construction beginning February 2024. Site inspections conducted by SPIECAPAG in 2024 confirm ongoing rehabilitation of activity areas.                                                                                                                                                                                                                                                                                                                                                  | Various SPIECAPAG site inspections in 2024                                                | Acceptable |
|              |                | Rehabilitation of the construction footprint will reinstate existing topography, infrastructure and appropriate vegetation in consultation with the landholder.       | The auditors sighted topography, infrastructure (e.g., fences, gates) and vegetation (predominantly pasture grasses) was as close as reasonably practicable to pre-construction conditions and congruent with surrounding land use. Site inspections conducted by SPIECAPAG between September 2023 and August 2024 confirmed on-going reinstatement of topography, infrastructure and vegetation.                                                                                                                                                                                                            | Various SPIECAPAG site inspections in 2024                                                | Acceptable |
|              |                | <b>Key rehabilitation activities will include:</b><br>Re-establishing topsoil cover.                                                                                  | As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                           | Acceptable |
|              |                | Installation of pipeline signage.                                                                                                                                     | The auditors sight pipeline markers along the pipeline easement, installed at appropriate spacing, including changes of direction. Site inspection conducted on 11 Oct 2023 by SPIECAPAG showed installation of pipeline signage at various locations along the pipeline that the auditors were unable to visit.                                                                                                                                                                                                                                                                                             | Various SPIECAPAG site inspections in 2024                                                | Acceptable |
|              |                | Reinstating roadways and road reserves in accordance with the requirements of local councils.                                                                         | City of Melton Council confirmed no further reinstatements are required to roadways (email dated 13/8/2024).<br>City of Whittlesea confirmed no further reinstatements are required to roadways (email dated 24/9/2024).<br>The latest communications between Hume City Council and SPIECAPAG is dated 27th of November 2024, with minimal reinstatements left to roadways including:<br>- Morefield Court<br>- Wildwood Road<br>- Mount Ridley Road / Parkland Crescent<br>Hume expressed once these are addressed they are satisfied with reinstatement works.                                             | Email confirmation from:<br><br>City of Melton<br>City of Whittlesea<br>Hume City Council | Acceptable |
|              |                | Reinstating fencing and access tracks in accordance with the requirements of landowners.                                                                              | The auditors sighted that fencing and access tracks had been reinstated at the sites visited (Merri and Jackson creek, Property 1 P5733045 and Conservation area 28B).<br>The APA Environmental Advisor informed that a low stone wall was replaced close to Conservation area 28B replacing a temporary fence that was there during construction. Furthermore, APA confirmed fencing had remained in place at Property 1 P5733045 at the landowners request.                                                                                                                                                | Various SPIECAPAG site inspections in 2024                                                | Acceptable |
|              |                | Reinstating natural drainage patterns.                                                                                                                                | The auditors sighted that the pipeline easement had been reinstated to match surrounding contours. The banks of Merri Creek were reinstated to be congruent with the banks immediately upstream and downstream of the pipeline crossing.<br>Jacksons Creek and Deep Creek were crossed using HDD methods; their drainage patterns were not affected by construction.                                                                                                                                                                                                                                         |                                                                                           | Acceptable |
|              |                | Application of seed or revegetation, where appropriate                                                                                                                | The rehabilitation line list outlines the location and amount of seeding to occur with site inspections conducted in 2024 showing progressive vegetation growth.<br><br>The auditors sighted tubestock growth along the reinstated Merri Creek banks, with the APA Environmental Advisor stating further planting will occur to account for tubestock that had been grazed or otherwise had not survived. Auditors sighted vegetation coverage above 70% at Property 1 P5733045 and Conservation area 28B. HDD entry pad area (east side of Wildwood Rodd) (Deep Creek) was stable with no signs of erosion. | Various SPIECAPAG site inspections in 2024                                                | Acceptable |
|              |                | Installing any erosion control measures in prone areas                                                                                                                | Auditors sighted erosion measures in place at Merri Creek and Jackson Creek on the day of the audit.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                           | Acceptable |
|              |                | Reinstating waterways to meet Melbourne Water requirements                                                                                                            | Inspection Report from Melbourne Water (MW) (20/2/2025) verifies watercourses have been inspected. 8 watercourses are completed as satisfactory with 7 requiring reseeding with the next MW inspection due to occur in September 2025.                                                                                                                                                                                                                                                                                                                                                                       | MW inspection report 20/2/2025                                                            | Acceptable |

|     |                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                |                |
|-----|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|----------------|
|     |                           | Revegetation of the construction area will be consistent with the original vegetation and in consultation with landowners.                                                                                                                                                                                                                                                                                                                                                                                                                                 | The auditors noted that vegetation (predominantly pasture grasses) was as close as reasonably practicably possible to pre-construction conditions and congruent with surrounding land use.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                | Acceptable     |
|     |                           | Deep-rooted vegetation will generally not be reinstated, due to the potential to interfere with the pipeline coating and impede operational access requirements.                                                                                                                                                                                                                                                                                                                                                                                           | Auditors noted that no trees were planted within the pipeline easement. The pipeline crossing at Merri Creek was revegetated with native grasses and small shrubs only; the roots of these plants will not interfere with the pipeline.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                | Acceptable     |
|     |                           | Where it does not pose a risk to pipeline integrity, trees in public places or those that provide screening for residences will be replaced if requested and in consultation with affected landholders.                                                                                                                                                                                                                                                                                                                                                    | The APA Environmental Advisor stated no trees were planted/replaced as this had not been requested by landholders.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                | Not applicable |
|     |                           | Tree plantings will meet requirements of the Asset Protection Zone and relevant bushfire management overlays.                                                                                                                                                                                                                                                                                                                                                                                                                                              | As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                | Not applicable |
|     |                           | Within roadways, surfaces will be reinstated in accordance with the requirements of the local Council                                                                                                                                                                                                                                                                                                                                                                                                                                                      | City of Melton Council confirmed no further reinstatements are required to roadways (email dated 13/8/2024).<br>City of Whittlesea confirmed no further reinstatements are required to roadways (email dated 24/9/2024).<br>The latest communications between Hume City Council and SPIECAPAG is dated 27th of November 2024, with minimal reinstatements left to roadways including:<br>- Morefield Court<br>- Wildwood Road<br>- Mount Ridley Road / Parkland Crescent<br>Hume expressed once these are addressed they are satisfied with reinstatement works.                                                                                                                                                                                                                                                    | Email confirmation from:<br><br>City of Melton - 13/8/2024<br>City of Whittlesea - 24/9/2024<br>Hume City Council - 27/11/2024 | Acceptable     |
|     |                           | Vegetated road reservations will also be restored in consultation with the local Council.                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Emails provided between SPIECAPAG and Hume City Council, City of Melton and City of Whittlesea confirm vegetated road reservations were restored to the councils' satisfaction.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Email confirmation from:<br><br>City of Melton - 13/8/2024<br>City of Whittlesea - 24/9/2024<br>Hume City Council - 27/11/2024 | Acceptable     |
|     |                           | Waterways will be reinstated to meet Melbourne Water requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Auditors sighted Merri Creek and Jackson Creek contours have been reinstated to their pre-construction state. Merri Creek had tubestock planted along the reinsgtated banks with further planting required due to loss of plants from grazing livestock. The HDD entry pad area (east side of Wildwood Rodd) (Deep Creek) appeared stable with no signs of erosion and had a high coverage of wheat.                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                | Acceptable     |
|     |                           | Monitoring within the construction area will be undertaken for 24 months post-construction and will include easement surveillance and rehabilitation works where required. In particular, the following would be undertaken:<br>- Inspection of native vegetation coverage<br>- Inspection of pasture establishment<br>- Inspection of weeds<br>- Inspection of subsidence or gully erosion<br>- Observations of watercourse re-establishment<br>- Monitoring post any major flooding event<br>- Any specific requirements agreed upon with the landowner. | Post-construction began in February 2024. The defect liability period is the 24 month period following post-construction.<br><br>Site inspection records conducted by SPIECAPAG included prompts of vegetation coverage, establishment, weed coverage and observations of watercourse re-establishment where applicable.<br><br><b>Observation</b><br>Maintenance invoice by HL Landscapes and PADDOCK solutions state weed spraying and insecticide applications occurred throughout May along the pipeline however, no further weed monitoring has been provided at the time of the audit. Auditors note samples of HL Landscape maintenance record reports include weed monitoring at Merri Creek have been sighted by auditors between 25/5/2024 and 20/8/2024. In July conditions were too wet for inspection. |                                                                                                                                | Acceptable     |
|     |                           | APA will prepare a rehabilitation close out report which will be submitted to the Minister for Energy within one month of the end of the monitoring period.                                                                                                                                                                                                                                                                                                                                                                                                | To be completed after the completion of the 24-month post-construction period (end in February 2026).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                | Not applicable |
| 2.9 | Operation and maintenance | The pipeline will commence operations in Quarter 2 of 2023 and this CEMP will remain in place for the first 24 months of operational activity. During this 24-month period the completed pipeline construction and rehabilitation works will be monitored to identify and correct defects. After this 24-month period, it is intended to seek regulatory approval that the continued operation of the pipeline will be undertaken in accordance and maintenance with the VTS OEMP.                                                                         | On the day of the audit, auditors sighted no obvious defects to rehabilitated sites along the pipeline. Various rehabilitation SPIECAPAG site inspections in 2024 show no obvious defects including:<br>- Erosion<br>- Damaged Fencing<br>- Soil crowning<br>- Soil subsidence<br><br>The APA Environmental Advisor stated that monitoring will be ongoing for the 24-month post-construction which concludes in February 2026.                                                                                                                                                                                                                                                                                                                                                                                     | Various SPIECAPAG site inspections in 2024                                                                                     | Acceptable     |

|              |                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                |                |
|--------------|------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|----------------|
| 11.1.3       | External audits                                      | <p>APA will also appoint an independent auditor to the satisfaction of the Minister for Energy or authorised delegate. The auditor appointment, audit plan, schedule and scope is subject to regulatory approvals under the Pipelines Act. External audits will include:</p> <ol style="list-style-type: none"> <li>1. Initial audit</li> <li>2. Construction progress audit</li> <li>3. Reinstatement completion audit</li> <li>4. Close out audit</li> </ol>                                                                                                                                                                                                                                              | <p>The first three audits have been conducted by Aventus Consulting, with Giulio Pinzone as the Lead Auditor. Aventus Consulting is independent to the day-to-day operations of the APA Group and the WORM project. Giulio is a Lead Auditor under the Exemplar Global scheme (certificate 129371).</p> <p>Don Hough, DEECA, as delegate for the Minister for Energy, approved Giulio as the Lead Auditor for this series of audits on 29/08/2022.</p>                                                                                                                                                                                                                                                                                                        | Confirmation Email between Aventus and APA (29/08/2022)                        | Acceptable     |
| 10.3         | Table 10.1 Regulatory reporting requirements         | <p><b>Completion of Reinstatement</b></p> <p>Email confirmation of the date which reinstatement activities are concluded and the period from which the rehabilitation monitoring period applies with an associated report of activities completed.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                      | The APA Environmental Advisor confirmed via email on 15/4/2025 that post-construction began in February 2024. Therefore, the monitoring period will conclude at the end of February 2026 (24 months after post-construction began).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Email from the APA Environmental Advisor on 15/4/2025                          | Acceptable     |
|              |                                                      | <p><b>End of rehabilitation monitoring period</b></p> <p>Email confirmation of the end of the 24-month rehabilitation monitoring period (see Section 2.9, above).</p> <p>APA will prepare a reinstatement close out report which will be submitted to the Minister for Energy within one month of the end of the monitoring period.</p> <p>The close out report will include evidence that reinstatement objectives and targets (Appendix F2.19) have been met, including:</p> <ul style="list-style-type: none"> <li>- Site-specific reinstatement assessments and photos</li> <li>- Landowner acceptance letters</li> <li>- Environmental matters to be carried over to the APA Operating EMP.</li> </ul> | The APA Environmental Advisor confirmed post-construction began in February 2024 (email sent on 15/4/2025). Therefore, the monitoring period will conclude at the end of February 2026 (24 months after post-construction began).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Email dated 15/4/2025 from the APA Environmental Advisor to Aventus Consulting | Not applicable |
| 11.6         | Records                                              | A copy of this CEMP and any relevant approvals/permits obtained for the Project will be available, either in hardcopy or electronic form, at the site office(s) for the duration of construction and rehabilitation works, until the date that the site offices are demolished.                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>At the time of the audit, the easement was reinstated and rehabilitated, with no site offices for hard copies to be retained at.</p> <p>The APA Environment Advisor stated that the CEMP and all relevant approvals/permits obtained for the Project were available on the APA database for the construction and rehabilitation works.</p>                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                | Acceptable     |
| BIODIVERSITY |                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                |                |
| F.2.3        | Environment Management Measures - Biodiversity B2(i) | <p><b>Pest plant/animal/pathogen control (construction)</b></p> <p>Implement the following measures during construction to manage biosecurity risks and address Catchment and Land Protection Act 1994 (CaLP Act) obligations:</p> <ul style="list-style-type: none"> <li>- Locate CaLP Act listed weeds in the construction area and assess the risk of additional spread prior to relocating topsoil, implement measures to manage this risk during clear and grade, and reinstatement.</li> </ul>                                                                                                                                                                                                        | Applies only to the construction phase.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                | Not applicable |
|              |                                                      | Evaluate disturbed areas post-construction and implement remedial measures as required within a reasonable timeframe.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <p>The APA Environmental Advisor has confirmed that evaluation of disturbed areas post-construction has been undertaken over the course of the project. Site inspections conducted by SPIECAPAG in 2024 show gradual reinstatement of the disturbed areas along the pipeline.</p> <p><b>Observation</b></p> <p>The term 'reasonable' is not auditable, the time frame should be specified.</p>                                                                                                                                                                                                                                                                                                                                                                | Various SPIECAPAG site inspections in 2024                                     | Acceptable     |
|              | Environment Management Measures - Biodiversity B7    | <p><b>Site rehabilitation after construction</b></p> <p>Reinstate the construction area with consideration of native vegetation composition indigenous to the area as applicable to site conditions, adjacent ground surface levels, and in consultation with the landholder and in accordance with any agreement made as part of easement negotiations.</p>                                                                                                                                                                                                                                                                                                                                                | <p>Native vegetation was reinstated along the banks Merri Creek in accordance with the SSEMP. Invoice from Prestige Plants Australia Pty Ltd (24/5/2024) provide plants including:</p> <p><i>Carex appressa</i>, <i>Carex tereticaulis</i>, <i>Juncus usitatus</i><br/> <i>Lomandra longifolia</i>, <i>Microlaena stipoides</i>, <i>Poa labillardieri</i>, <i>Themeda triandra</i>.</p> <p><b>Observation</b></p> <p>No native grass was planted at Property 1 PS733045 (contrary to commitment in SSEMP). The APA Environmental Advisor confirmed this was because there was no native vegetation there prior to construction (the ecology assessment for this area had been desktop only and had been incorrect) and it was used for livestock grazing.</p> | Prestige Plants Australia Pty Ltd dated 24/5/2024                              | Acceptable     |
|              |                                                      | In known and assumed Golden Sun Moth and Striped Legless Lizard habitat that contain native patches of grassland, revegetate areas with appropriate native grass seed mix (e.g. Wallaby Grass, Spear Grass, Kangaroo Grass) that provide habitat and food sources. On private property this will be in consultation with landowners.                                                                                                                                                                                                                                                                                                                                                                        | Site inspections throughout 2024 undertaken by SPIECAPAG show fenced and marked off areas of Golden Sun Moth and Striped Legless Lizard habitat. The rehabilitation line list supplied by the APA Environmental Advisor confirms no ripping to place in these areas.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Various SPIECAPAG site inspection reports in 2024                              | Acceptable     |

|       |                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                              |             |
|-------|----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|-------------|
|       |                                                    | Rehabilitation of construction areas and all temporary facilities, temporary access tracks and extra works areas would begin as soon as practicable after the completion of the construction activities, with the aim of restoration of ground cover within six months. Rehabilitation activities are estimated to take approximately three months. Any applicable replanting will be undertaken within 12 months of construction completion (subject to seasonal requirements).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | SPIECAPAG have provided various weekly, fortnightly and monthly site inspections from the rehabilitation and reinstatement phase of the project between 2023 and 2024 at construction sites with photographic evidence showing progressive reinstatement of activity areas and access tracks.                                                                                                                                                                                                                                                                                                                                                            | Various SPIECAPAG site inspection reports in 2023 - 2024                     | Acceptable  |
|       |                                                    | Subject to landholder agreement the following requirements to return habitat features to the construction area will be considered:<br><br>Return habitat features removed during construction such as large hollow logs and large rocks or rock piles to the construction area during rehabilitation if consistent with rehabilitation objectives at a particular location.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | The auditors visited various sites with all being reinstated to pre-construction conditions with Merri Creek vegetation felled during construction (large tree trucks) correctly returned by being placed at the top of creek bank.<br><br>Site inspections conducted by SPIECAPAG in 2024 show habitat features being returned to pre-construction conditions including rocks, rock walls and logs. The land owner sign off records were provided confirming sign over to various land owners.                                                                                                                                                          | Various SPIECAPAG site inspections in 2024<br><br>Land owner sign off sheets | Acceptable  |
|       |                                                    | Rip soil surfaces that have been compacted due to construction activities, such as those subject to traffic or storage areas within the construction area, to allow the topsoil to bind with the subsoil and increase water filtration, as appropriate, prior to revegetation with indigenous native species. Do not rip areas that are either known or assumed Golden Sun Moth or Striped Legless Lizard habitat and contained patches of native vegetation prior to construction.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Auditors sighted land use has returned to pre-construction uses as close as reasonably practicable with sites such as Property 1 PS733045 and Deep Creek seeing vegetation growth coverage well above 70%. Merri Creek banks have been reinstated with pasture grass growth on either side.<br>In accordance with the rehabilitation line list supplied by SPIECAPAG, the SLL and GSM habitats were not ripped.<br><br>Inspections conducted by SPIECAPAG display photographic evidence of ripping of the soil where construction has occurred at various locations including Conservation Area 28B, Merri Creek, Jackson Creek and Property 1 PS733045. | Various SPIECAPAG site inspections in 2024                                   | Acceptable  |
|       |                                                    | Subject to MWC requirement, Merri Creek will take into consideration appropriate instream and terrestrial reinstatement of habitat with regard to Growling Grass Frog habitat.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Refer Merri Creek SEMP. Instream and terrestrial rehabilitation at Merri Creek appears to suitable for frog habitat.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                              | Acceptable  |
|       | Environment Management Measures - Biodiversity B8  | <b>Topsoil management</b><br>Topsoil imported to construction area from external locations must be free of weeds and pathogens. Stockpiled topsoil removed from weed-infested sites for the Project must only be re-used, as far as reasonably practicable, in the location that it was originally sourced from. Stockpiled topsoil from weed-infested sites may be reused where soil is sourced from sites supporting Golden Sun Moth where larvae may be present.<br>For impacted areas that are Golden Sun Moth habitat:<br>In areas that are to be disturbed temporarily (i.e., reinstated after construction) and that require topsoil removal, the period between pre-trenching topsoil removal and post-trenching topsoil replacement must be minimised to the extent practicable.<br><br>Where the removal of topsoil is unavoidable appropriate measures to remove, separate (from sub-soils) and replace topsoils in the construction area must be undertaken. As far as reasonably practicable, topsoil will be progressively reinstated.<br><br>Stockpiled topsoil from weed-infested sites may be reused at the same location where the soil is sourced from if the site supports golden sun moth and where larvae may be present. | The APA Environmental Advisor stated that no topsoil was imported for rehabilitation purposes. There is no available evidence to the contrary.<br><br><u>Observation</u><br>There is no written evidence to verify the advisor's statement. Ideally, inspection checklists should have included a prompt about whether topsoil was imported or not.                                                                                                                                                                                                                                                                                                      |                                                                              | Observation |
| F.2.3 | Environment Management Measures - Biodiversity B15 | <b>Reinstate native vegetation</b><br>Where natural regeneration of species in situ is not feasible, revegetate the area using seed or nursery stock obtained from within the local area, to support preservation of native vegetation values within the broader area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Merri Creek had tubestock planted along the reinstated banks with further planting required due to grazing livestock. Sighted vegetation coverage above 70% at Property 1 PS733045 and Conservation area 28B.                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                              | Acceptable  |

|                                |                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                           |                |
|--------------------------------|----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                                |                                                    | <p>Prepare a Site Rehabilitation Plan(s) for revegetation of native vegetation within the construction area, including:<br/>         -the whole of the construction area within the southern paddock of Property 1/PS733045<br/>         -Conservation Areas 34a and 28b (refer to the ELL in Appendix E).</p>                                                                                                                                                                | <p>Auditors have sighted individual SSEMPs for:</p> <ul style="list-style-type: none"> <li>- Jackson Creek</li> <li>- Merri Creek</li> <li>- Deep Creek</li> <li>- Conservation Area 28B</li> <li>- Property PS733045.</li> </ul> <p>Further EMPs have been prepared to encompass all sites including:</p> <ul style="list-style-type: none"> <li>- Reinstatement and Rehabilitation Procedures</li> <li>- Tree MP</li> <li>- Minor Watercourse Crossing MP</li> <li>- Fauna MP</li> <li>- Primary Erosion and Sediment MP</li> <li>- Sodic and Dispersive MP.</li> </ul>                 | <p>Jackson Creek SSEMP<br/>         Merri Creek SSEMP<br/>         Deep Creek SSEMP<br/>         Conservation Area 28B SSEMP<br/>         Property PS733045 SSEMP<br/>         Reinstatement and Rehabilitation Procedures MP<br/>         Tree MP<br/>         Minor Watercourse Crossing MP<br/>         Fauna MP<br/>         Primary Erosion and Sediment MP<br/>         Sodic and Dispersive MP</p> | Acceptable     |
|                                |                                                    | <p>The plan(s) shall be prepared in consultation with each landholder and in accordance with any agreement made as part of easement negotiations. The plan(s) is to be verified by a qualified and experienced bushland restoration land management contractor. Revegetation with native vegetation is to be undertaken in accordance with the Site Rehabilitation Plan(s).</p>                                                                                               | <p>Appendix C of the Rehab Plan provides the verification by Lucas Piperides, a qualified and experienced bushland restoration land management contractor.</p> <p>The achievements &amp; certificates of Lucas Piperides include:</p> <ul style="list-style-type: none"> <li>- Bachelor of Built Environment (Landscape Architecture)</li> <li>- Bachelor of Construction Management</li> <li>- Certificate II and III in Landscape Construction</li> <li>- Diploma in Horticulture</li> <li>- Certificate IV in OH &amp; S</li> <li>- Site Supervisor BSA License No: 1236547</li> </ul> | <p>Lucas Piperides CV</p>                                                                                                                                                                                                                                                                                                                                                                                 | Acceptable     |
|                                |                                                    | <p>The Site Rehabilitation Plan is to include any specific monitoring requirements and contingency measures for addressing potential rehabilitation issues such as weed invasion and sodic and dispersive soils, as they arise.</p>                                                                                                                                                                                                                                           | <p>Section 6 of the Merri Creek SSEMP outlines potential issue management related to weed, biosecurity, phytophthora and Chytrid Fungus introduction, while sodic and dispersive soils are outlined in section 5.3. Section 9 outlines monitoring requirements.</p>                                                                                                                                                                                                                                                                                                                       | <p>Site Specific Environment Management Plan – Merri Creek (18035-PL-HSE-0028 Rev 1)</p>                                                                                                                                                                                                                                                                                                                  | Acceptable     |
|                                |                                                    | <p>Site Rehabilitation Plans for Conservation Areas must be submitted to and approved by DEECA.</p>                                                                                                                                                                                                                                                                                                                                                                           | <p>Site Specific Environment Management Plan – Conservation Area 28B is in place (18035-PL-HSE-0031), Rev 0 dated 3/11/22 outlined acceptance will be based on attachments provided with submission 2 of the SSEMP. No formal letter of endorsement from DELWP has been sighted.</p> <p>The document control page of the Site Specific Environment Management Plan – Merri Creek (18035-PL-HSE-0028 Rev 1) says it was accepted by DELWP on 28/11/2022. The formal letter of endorsement from DELWP has been sighted.</p>                                                                 | <p>Conservation Area 28B SSEMP<br/>         Merri Creek SSEMP</p>                                                                                                                                                                                                                                                                                                                                         | Observation    |
|                                | Environment Management Measures - Biodiversity B17 | <p><b>Barriers to fish passage and / or migration</b><br/>         Minimise the creation of a barrier that impedes native fish passage and /or migration, and the time required for installation of the pipeline during open cut trenching across Merri Creek by using the following approaches:<br/>         Reinstatate the exposed trench within the watercourse and riparian zones as soon as reasonably practicable following the installation of the pipeline.</p>      | <p>Site inspection conducted on 28/02/2024 confirmed Merri Creek reinstatement works (including trench backfill) were completed on 28 and 29 February 2024. Works included the removal of pumps to limit flow diversions. February 2024 therefore marks the beginning of the rehabilitation period at this location.</p>                                                                                                                                                                                                                                                                  | <p>SPIECAPAG site inspection on 28/2/2024</p>                                                                                                                                                                                                                                                                                                                                                             | Acceptable     |
| F.2.3                          | Environment Management Measures - Biodiversity B18 | <p><b>Value-specific mitigation</b><br/>         Develop and implement specific measures to protect EPBC Act and/or FFG Act communities that are impacted, including:<br/>         Retention of stockpiled vegetation to be used for site rehabilitation</p> <p>Rehabilitating disturbed areas as soon as reasonably practicable</p>                                                                                                                                          | <p>Site inspection records by SPIECAPAG confirm the retention of stockpiled vegetation which was later used for rehabilitation at Merri Creek.</p> <p>On the day of the audit, auditors sighted the re-use of previously stockpiled vegetation at Merri Creek. Rocks were placed along the banks of the Creek with tree vegetation placed to promote species habitats.</p> <p>Site inspections conducted by SPIECAPAG confirm progressive reinstatement throughout 2024 after construction completion.</p>                                                                                | <p>Various SPIECAPAG weekly and CH site inspections in 2024</p> <p>Various SPIECAPAG weekly and CH site inspections in 2024</p>                                                                                                                                                                                                                                                                           | Acceptable     |
| F.2.3                          | Environment Management Measures - Biodiversity B19 | <p><b>Fauna Mitigation – Golden Sun Moth</b><br/>         Prepare and implement a Golden Sun Moth Management Plan and obtain approval for the plan from DEECA. The plan must include details regarding:<br/>         Rehabilitation measures</p>                                                                                                                                                                                                                              | <p>The Golden Sun Moth is incorporated in all SSEMPs containing rehabilitation measures.</p> <p>Site inspection reports by SPIECAPAG did outline whether Golden Sun Moth habitat occurred in the work area.</p>                                                                                                                                                                                                                                                                                                                                                                           | <p>Jackson Creek SSEMP<br/>         Merri Creek SSEMP<br/>         Deep Creek SSEMP<br/>         Conservation Area 28B SSEMP<br/>         Property PS733045 SSEMP</p>                                                                                                                                                                                                                                     | Acceptable     |
| Cultural and historic heritage |                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                           |                |
| F.2.4                          | Environment Management Measures - Biodiversity CH6 | <p><b>Impacts on the Merri Creek Site of Geological and Geomorphological Significance (VRO Site 35)</b><br/>         Determine appropriate protection and restoration measures for the geological and geomorphological values of the site based on the advice of an appropriately qualified geomorphologist.</p> <p>Ensure that rehabilitation of the construction area at this site restores the natural geomorphology of the site to the extent reasonably practicable.</p> | <p>This was addressed in the construction audit.</p> <p>Auditors sighted Merri Creek stabilisation has occurred with rock check used along the lower banks of the creek. Rehabilitation of vegetation growth has occurred with some tubestock along the creek banks, though much of it has been grazed by wildlife, and therefore stunted in growth.</p>                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                           | Not applicable |
|                                |                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                           | Acceptable     |

|                 |                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                               |                                                        |                |
|-----------------|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|----------------|
|                 |                                                    | Consultation is to be undertaken with the Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation in regard to proposed protection and restoration measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Section 3.2 of the APA CEMP confirms it was prepared in consultation with and approved by the Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation in regard to proposed protection and restoration measures.                                                                      | APA CEMP                                               | Acceptable     |
| Ground movement |                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                               |                                                        |                |
|                 | Environment Management Measures - Biodiversity GM4 | <b>Management of trench erosion, consolidation and swelling</b><br>Implement measures to manage soil dispersion, erosion, consolidation and swelling risks including:<br>Additional measures for rehabilitation and monitoring of trenced waterways are contained in EMM SW3.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Please refer to EMM - SW3.                                                                                                                                                                                                                                                                    |                                                        | Not applicable |
|                 | Environment Management Measures - Biodiversity GM7 | <b>Preparation and implementation of sodic and Dispersive soil management measures</b><br>Develop and implement a Sodic and Dispersive Soils Management Plan (SDSMP). The SDSMP is to be prepared by one or more suitably qualified professionals with relevant expertise, including soil science and geotechnical expertise or CPESC, for acceptance by DEECA for inclusion in an EMP under the Pipelines Act prior to commencement of clear and grade works. The SDSMP must include:<br><br>Requirements for soil management practices (including fill) in areas identified as medium to high dispersion risk on the Environmental Line List, with consideration of anticipated sodic and dispersive soil exposure, including:<br><br>Rehabilitation of disturbed areas, including any treatment to manage the soil postconstruction (additional to requirements of existing EMMs).<br><br>Post-construction monitoring and management requirements. | A SDSMP was prepared by a suitably qualified person, Dennis Baker, with relevant expertise, including soil science. The SDSMP fulfils the requirements of this condition.                                                                                                                     | The Sodic and Dispersive Soils Management Plan (SDSMP) | Acceptable     |
| LAND USE        |                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                               |                                                        |                |
| F.2.8           | EMM - LU1                                          | <b>Impacts to Precinct Structure Plans (PSPs) and growth areas</b><br>Minimise impacts as far as reasonably practicable to PSPs and growth areas by providing for consistency with approved and PSPs that are yet to be approved. This must include:<br><br>Rehabilitating land within existing PSPs in accordance with EMM LU2.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | See EMM LU2 (next row).                                                                                                                                                                                                                                                                       |                                                        | Not applicable |
|                 | EMM - LU2                                          | <b>Continuation of existing land uses</b><br>Rehabilitate land in accordance with this CEMP and agreements with landowners.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | See section 2.8 of this spreadsheet.<br><br>Land Owner Sign Off Register (4/9/2024) shows constant consultation with landowners before land owner sign off.                                                                                                                                   |                                                        | Acceptable     |
|                 | EMM - LU11                                         | Progressively commence and complete reinstatement as soon as reasonably practicable post-construction.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Site inspections conducted by SPIECAPAG confirm progressive reinstatement throughout 2023 and 2024 after construction completion. At the time of the audit, all reinstatement had taken place.                                                                                                | SPIECAPAG weekly and CH site inepsections 2023 - 2024  | Acceptable     |
|                 | EMM - LU12                                         | Reprofile the construction area to original contours or to new, stable contours (where it is not reasonably practical to re-profile to original contour) in line with contractor construction specification.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Auditors sighted rehabilitation at sites visited such as Merri Creek, Jackson Creek and Conservation Area 28B, was in accordance with relevant SSEMPs. The easement was reprofiled to be congruent with the surrounding area.                                                                 |                                                        | Acceptable     |
|                 | EMM - LU13                                         | Apply soil amelioration and fertiliser where required as determined by soil assessments and tailored to rehabilitation requirements in consultation with the landholder.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | The rehabilitation line list supplied by SPIECAPAG outlines the requirements for application of fertilisers and soil amelioration along the pipeline construction right-of-way.                                                                                                               | Rehabilitation line list                               | Acceptable     |
|                 | EMM - LU14                                         | Compact the trench backfill as per APA's performance specification and contractor's construction specifications. Degree of compaction to take into account design load limits on the pipe whilst minimising changes to pre-construction groundwater conditions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Site inspections conducted by SPIECAPAG between September 2023 and August 2024 confirm trench backfill and compaction has occurred in accordance with construction specifications.                                                                                                            | SPIECAPAG weekly and CH site inepsections 2023 - 2024  | Acceptable     |
|                 | EMM - LU15                                         | Implement compaction relief by ripping or scarifying areas of the construction area which have been compacted by construction activities. Particular attention must be given to areas subject to regular watering and high traffic volume.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Site inspections conducted by SPIECAPAG between September 2023 and August 2024 confirm compaction and ripping of soils occurred.                                                                                                                                                              | SPIECAPAG weekly and CH site inepsections 2023 - 2024  | Acceptable     |
|                 | EMM - LU16                                         | Reinstate all access tracks, fences and gates post- construction in consultation with landholders and any relevant third parties.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Reinstatement of access tracks, fences and gates were in consultation with landowners with the land ownersign off spreadhseet supplied by APA confirming the areas where fencing and gates are required. On the day of the audit, auditors sighted access tracks reinstated at sites visited. |                                                        | Acceptable     |

|                    |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                      |                |
|--------------------|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|----------------|
|                    | EMM - LU17 | Install permanent access gates post-construction, where required at fence intersections and for access to MLV compounds which will be completely fenced.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | On the day of the audit, auditors sighted permanent access gates in place at various sites visited to allow access to RoW.<br><br>The auditors did not visit MLV compound sites.                                                                                                                                                                                                                                                                                                                       |                                                      | Acceptable     |
|                    | EMM - LU18 | Where seeding is adopted to facilitate prompt revegetation and soil stabilisation, consider the following principles:<br>• Formulate seed mixtures with consideration of the vegetation composition of the areas adjacent to the construction area and in consultation with the relevant landholder.<br>• Sterile seed stock (cover crop) may be used to provide short term surface stability.<br>• Disperse seed evenly dispersed over the disturbed area.<br>• Seeding to take place as soon as reasonably practicable after reinstatement of the soil profile.<br>• A suitable fertilizer may be applied depending on soil conditions and any landholder requirements. | A rehabilitation line list provided by SPIECAPAG outlines the location and amount of seeding and fertiliser that occurred, with site inspections conducted between September 2023 and August 2024 showing progressive vegetation growth.<br><br>On the day of the audit, auditors sighted vegetation growth above 70% at various locations with very few areas showing poor revegetation.                                                                                                              | Rehabilitation line list                             | Acceptable     |
|                    | EMM - LU19 | Monitor the condition of the construction area and other disturbed areas post-construction with remedial measures undertaken, as required, with the aim that all disturbed areas are re-profiled to a stable landform consistent with original contours and drainage lines, or proposed new stable contours, and vegetated with a self-sustaining, non-pest species groundcover.                                                                                                                                                                                                                                                                                          | Site inspections conducted by SPIECAPAG confirm progressive reinstatement throughout 2023 and 2024 after construction completion. The auditors sighted that the easement was reprofiled to be congruent with the surrounding area with a high cover of pasture vegetation along the easement.                                                                                                                                                                                                          | SPIECAPAG weekly and CH site inspections 2023 - 2024 | Acceptable     |
| LANDSCAPE & VISUAL |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                      |                |
| F2.9               | EMM - LV5  | Where trees and shrubs within the approved construction area are lost and affect public places or existing screening of private residences from road reserves, replace trees and shrubs where practicable and reasonably requested, subject to any necessary approvals being granted, in accordance with a planting and remediation plan prepared under LV7.                                                                                                                                                                                                                                                                                                              | The APA Environmental Advisor stated no trees and shrubs were planted.                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                      | Not applicable |
| F2.9               | EMM - LV6  | Introduce trees and shrubs to screen the mainline valve from roads and residences, if requested by affected landholders, does not is a threat to pipeline integrity and subject to any necessary approvals being granted in accordance with a planting and remediation plan prepared under LV7.                                                                                                                                                                                                                                                                                                                                                                           | The APA Environmental Advisor explained that the introduction of trees and shrubs were deemed inappropriate to plant near gas infrastructure                                                                                                                                                                                                                                                                                                                                                           |                                                      | Not applicable |
| F2.9               | EMM - LV7  | Develop and implement a planting and remediation plan (applicable to screening trees directly impacted) where planting of trees and shrubs are proposed, in consultation with any affected landowners where requested.<br><br>Planting will be undertaken in accordance with relevant bushfire management overlays for the area and with consideration of APA requirements for restricted uses within an easement and asset protection zones.<br>The plan must outline a monitoring and defects period for the planting and remediation.<br>The plan must be reviewed by the responsible authority (if planting on Crown land) and affected landholder.                   | The APA Environmental Advisor stated that no screen planting was undertaken at landowner properties.<br><br>Of the landowner forms sighted by the auditors, none included information about planting for screening.                                                                                                                                                                                                                                                                                    |                                                      | Acceptable     |
| Safety             |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                      |                |
| F.2.10             | EMM - SA6  | Develop and implement a Traffic Management Plan(s) (TMP). The TMP(s) should be prepared with input from the relevant Responsible Authority and be approved by the relevant road authorities and include provision for:<br>Restoration of road surface post-pipeline construction, as necessary. This includes pre- and post-construction surveys of roads likely to be impacted by construction activity                                                                                                                                                                                                                                                                  | Traffic management plan includes the restoration of road surface post-pipeline construction.<br><br>Various road authorities were consulted with surveys conducted post-construction with City of Melton Council, City of Whittlesea and Hume City Council.<br><br>The APA Environmental Advisor confirmed no traffic management issues occurred with approvals and permits were granted for road closures with traffic management plans mainly used throughout the construction phase of the project. | Traffic management plan (18035-PL-HSE-0013 Rev B)    | Not applicable |
| SURFACE WATER      |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                      |                |

|       |           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                    |                |
|-------|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|----------------|
| F2.12 | EMM - SW1 | <p><u>Managing runoff from adjacent construction areas, discharge from dewatering activities and spills / leaks</u></p> <p>Implement measures to minimise risks of harm so far as reasonably practicable on downstream environments due to construction activities and potential runoff. This is to be in accordance with:</p> <ul style="list-style-type: none"> <li>- EPA Publication 1834: Civil construction, building and demolition guidance,</li> <li>- Publication 1894: Manage soil disturbance,</li> <li>- Publication 1895: Manage stockpiles,</li> <li>- Publication 1896: Manage how you work within or adjacent to waterways</li> <li>- Publication 1897: Manage truck and other vehicle movement, including:</li> </ul> <p>-Where practicable, construct all trenched crossings of ephemeral watercourses during no or low flow conditions and reinstated as soon as reasonably practicable.</p> | Site inspections undertaken by SPIECAPAG displayed works were undertaken during minimal flow at Merri Creek. On the day of the audit, auditors sighted Merri Creek reinstated to a condition as close as reasonably practicably possible to its pre-construction state. Merri Creek was the only water crossing inspected on the day of the audit.                                                                                                                                                                                | Various SPIECAPAG site inspection records in 2024. | Acceptable     |
|       | EMM - SW3 | <p><u>Site Rehabilitation measures for disturbance caused by open cut trench construction</u></p> <p>Implement site rehabilitation measures to minimise the impacts to waterway health as far as reasonably practicable and in accordance with EPA Publication 1896: Manage how you work within or adjacent to waterways including:</p> <p>Compact soil, scarify and re-profile the land to original contours to maintain the waterway and floodplain function.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                             | As per EMM-SW1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                    | Acceptable     |
|       |           | Restrict any operational works to the easement only, with landholder requirements determined prior to commencement of works.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | There was no evidence of works taking place outside the easement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                    | Acceptable     |
|       |           | Restore waterway bed and banks as soon as reasonably practicable after pipe installation and backfilling works                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>Post-construction began in February 2024. The defect liability period is the 24 month period following post-construction.</p> <p>Embankment planting occurred along Merri Creek in May 2024 by HL Landscapes. 600m<sup>2</sup> of 50mm Virotube @ 6 plants per m<sup>2</sup>, excluding soil was planted &amp; 700gsm slitted jute matting were placed with a rock check on top to further stop erosion.</p> <p>On the day of the audit, the bed of Merri Creek was sighted to be lined with rocks in line with the SSEMP.</p> | HL Landscapes records                              | Acceptable     |
|       |           | Restore banks by grading (nominally 1:3 grade, and revegetation), and smoothly transition to the undisturbed banks (refer to APA standard drawing no. 530-DWG-L-5008)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                    | Acceptable     |
|       |           | Restore waterway bed to preconstruction profile, and smoothly transition to the upstream and downstream undisturbed bed condition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                    | Acceptable     |
|       |           | Provide temporary protection such as geofabric or erosion matting on bed and banks to prevent erosion until vegetation has established                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                    | Acceptable     |
|       |           | Carry out routine inspections (e.g. minimum every six months plus potentially following any significant flood event) to monitor effectiveness of civil rehabilitation works (earthworks and rock beaching works) during the first 24 months post-construction. Where monitoring identifies defects or deficiency in civil rehabilitation works, appropriate rectification measures will need to be implemented.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Various site inspections have been conducted by SPIECAPAG along the pipeline with further inspections required until the end of the 24 month period (to February 2026).                                                                                                                                                                                                                                                                                                                                                           | Various SPIECAPAG site inspections in 2024         | Not applicable |
|       |           | <p>Establishment of vegetation cover within the first three months post-construction.</p> <p>Following establishment of vegetation/ground cover, routine maintenance to be undertaken for a period of 24 months to monitor and manage successful reinstatement.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>Reinstatement along the pipeline was progressive with the APA Environmental Advisor stated that the beginning of the post-construction period was February 2024. Routine maintenance and monitoring period will conclude February 2026.</p> <p>Reinstatement was progressive along the pipeline with various sites still being reinstated through February, March and April 2024. The APA Environmental Advisor stated ongoing maintenance will take place until reinstatement is satisfactory.</p>                            |                                                    | Acceptable     |
|       |           | Include site-specific application of rock beaching protection as part of site rehabilitation where required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Per earlier rows regarding Merri Creek.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                    | Acceptable     |

|               |                        |                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                    |                |
|---------------|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|----------------|
|               |                        | Reinstate the exposed trench within the watercourse and riparian zones as soon as reasonably practicable following the installation of the pipeline.                                                                                                           | On the day of the audit, auditors sighted width, gradient and depth, has been re-established after construction to preconstruction conditions at Merri Creek in line with the SSEMP.<br><br>Site inspection conducted on 28/02/2024 confirmed Merri Creek reinstatement works (including trench backfill) were completed on 28 and 29 February 2024. February 2024 therefore marks the beginning of the rehabilitation period at this location.                                                                                                                                                                                                                                                                                                                                                                                                                      | SPIECAPAG site inspection on 28/2/2024             | Acceptable     |
|               |                        | Design waterway reinstatement to avoid future erosion over the pipeline alignment and to provide bank stability at the crossing location as the same or better than prior to construction.                                                                     | Auditors sighted reinstated creek banks at Merri Creek were stable and the easement appeared congruent with the surrounding landscape.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                    | Acceptable     |
|               |                        | Provide temporary erosion and sediment control as needed to prevent erosion and scour until the vegetation has established throughout the post-construction period (e.g. up to 12 months depending on establishment of vegetation).                            | Per EMM-SW3 with regards to Merri Creek.<br><br>Tributary at Jackson creek had erosion control devices in place (coir logs) that will remain in place as they are biodegradable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                    | Acceptable     |
|               |                        | Restore waterway bed and banks as soon as reasonably practicable after pipe installation and backfilling works, including revegetation using geofabric to provide temporary protection until vegetation is re-established.                                     | Per EMM-SW3 with regards to Merri Creek.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                    | Acceptable     |
|               |                        | For steeper gullies, use rock beaching for additional stabilisation where practicable.                                                                                                                                                                         | No steep gullies with rock beaching were sighted during the audit.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                    | Not applicable |
|               |                        | Carry out bed and bank restoration, temporary protection and monitoring of establishment works as part of the site rehabilitation.                                                                                                                             | Per EMM-SW3 with regards to Merri Creek.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                    | Acceptable     |
| REINSTATEMENT |                        |                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                    |                |
|               | EMM - Reinstatement R2 | If weather conditions prevent the prompt reseedling of the disturbed areas within the construction area, controls must be put in place, monitored and maintained to manage erosion and sedimentation until such time reseedling can occur                      | The evidence supplied did not contain any information to suggest that weather conditions prevented re-seeding.<br><br>The APA Environmental Advisor confirmed weather conditions did not prevent reseedling efforts of the pipeline construction RoW, temporary erosion and sediment control measures were biodegradable with auditors sighting the use of erosion barriers at Jackson Creek. At Merri Creek, geofabric material and soil berms were used to prevent erosion along the revegetated banks.<br><br><b>Observation</b><br>Site inspection reports did not outline if weather conditions hampered re-seeding efforts. The APA Environmental Advisor stated that adverse weather is only recorded if this was a valid reason for a delay in re-seeding and it is not appropriate to reseed out of season when germination is unlikely and efforts wasted. |                                                    | Observation    |
|               | EMM - Reinstatement R3 | The construction area must be rehabilitated to pre-existing contours with natural drainage lines restored and protected if required. Where required, seeding, soil conditioning of disturbed areas must be undertaken as part of the reinstatement activities. | Auditors sighted land use has returned to pre-construction uses as close as reasonably practicable, with the pipeline easement generally congruent with surrounding land use.<br><br>In accordance with the rehabilitation line list supplied by SPIECAPAG, the Striped Legless Lizard and Golden Sun Moth habitats were not ripped.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                    | Acceptable     |
|               | EMM - Reinstatement R4 | Soil inversion must be avoided during respreading of topsoil                                                                                                                                                                                                   | There was no evidence of soil inversion at the time of the audit (e.g., poor grass growth over the trench).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                    | Acceptable     |
|               | EMM - Reinstatement R5 | Soil surfaces that have been compacted due to construction activities, such as those subject to traffic or storage areas within the construction area, must be ripped to allow the topsoil to bind with the subsoil and increase water filtration              | Inspections conducted by SPIECAPAG display photographic evidence of ripping of the soil where construction has occurred at various locations, including Conservation Area 28B, Merri Creek, Jackson Creek and Property 1 PS733045.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Various SPIECAPAG site inspection records in 2024. | Acceptable     |
|               | EMM - Reinstatement R6 | Targeted control of weeds must be undertaken by a qualified pest plant control contractor to ensure that the construction area does not have an increased density and distribution of noxious and agricultural weeds relative to adjacent areas                | Weed invoices supplied by SPIECAPAG confirm weed control has occurred along the pipeline between 28/3/2024 and 23/6/2024.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | SPIECAPAG weed invoices                            | Acceptable     |

|                        |                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                        |                             |
|------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|-----------------------------|
| EMM - Reinstatement R7 | Following completion of reinstatement, agreement must be sought from landowners (and occupiers, managers or government agencies as applicable) of the satisfaction of the reinstatement work as required by conditions of the Pipelines Licence.                                                                                                                                                     | This commitment does not identify the reinstatement timeframe. It is assumed that the timeframe is 24 months after completion of construction, but this is not made clear, therefore the auditors assume that sign off from landowners does not need to be closed out until the 24-month rehabilitation period closes (in February 2026).<br>At the time of the field inspection several landowners still had not signed off on reinstatement. As of the time of preparing this report, several landowners had still not signed off on reinstated. Without a specified timeframe for obtaining landowner signoff, it is not possible to determine compliance with this commitment. | Landowner sign off register (4/9/2024) | Opportunity for improvement |
| EMM - Reinstatement R8 | Following the completion of reinstatement activities, the construction area must be monitored for a period of 12-24 months to ensure the land is stable and consistent with adjacent areas. Any defects from construction must be rectified during this time and following this period any residual environmental issues must be addressed through the APA's Operating Environmental Management Plan | The APA Environmental Advisor confirmed via email that post-construction began in February 2024 therefore the monitoring period will conclude in February 2026 (24 months after the beginning of post-construction).                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                        | Not applicable              |
| EMM - Reinstatement R9 | Reinstatement will be undertaken in accordance with land owner agreements required under the Pipeline Licence                                                                                                                                                                                                                                                                                        | As per EMM - R7.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Landowner sign off register (4/9/2024) | Opportunity for improvement |

|                             |           |
|-----------------------------|-----------|
| Acceptable                  | 68        |
| Major non-conform           | 0         |
| Minor non-conform           | 0         |
| Observation                 | 3         |
| Opportunity for improvement | 2         |
| Not applicable              | 10        |
| <b>Total</b>                | <b>83</b> |



**PRELIMINARY DRAFT WORM Commitments Register (based on WASCO CEMP Rev D, dated 14/02/23)**

| Section                        | Title                                            | Text extract from CEMP                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Audit finding                                                                                                                                                                                                                                                                                                                                                                                  | Document reference                                                        | Compliant?  |
|--------------------------------|--------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|-------------|
| 19.1                           | Environment Performance Objectives and Standards | It is emphasised that all activities related to all phases of the project should:<br>- Achieve excellent reinstatement outcomes                                                                                                                                                                                                                                                                                                                                                                                                   | On the day of the audit, auditors sighted reinstatement around the site with ground vegetation coverage above 70%. Sloped areas displayed minimal signs of erosion, access track and car park were easily defined with no signs of works outside the RoW.                                                                                                                                      |                                                                           | Acceptable  |
|                                | B7                                               | <b>Site Rehabilitation After Construction</b><br>Rehabilitation of construction areas and all temporary facilities, temporary access tracks and extra works areas would begin as soon as practicable after the completion of the construction activities, with the aim of restoration of ground cover within six months. Rehabilitation activities are estimated to take approximately three months. Any applicable replanting will be undertaken within 12 months of construction completion (subject to seasonal requirements). | On the day of the audit, auditors sighted reinstatement around the site with ground vegetation coverage above 70%. Batters displayed minimal signs of erosion, access track and car park were easily defined with no signs of works outside the RoW.<br><br><b>Observation</b><br>Of the WASCO site inspections sighted by the auditors, none appear to relate to the dates of rehabilitation. |                                                                           | Observation |
|                                | B18                                              | Retention of stockpiled vegetation to be used for site rehabilitation<br>Rehabilitating disturbed areas as soon as reasonably practicable                                                                                                                                                                                                                                                                                                                                                                                         | As above.                                                                                                                                                                                                                                                                                                                                                                                      |                                                                           | Observation |
| 19.2.7                         | LU11                                             | Progressively commence and complete reinstatement as soon as reasonably practicable post-construction.                                                                                                                                                                                                                                                                                                                                                                                                                            | As above.                                                                                                                                                                                                                                                                                                                                                                                      |                                                                           | Observation |
| 19.2.7.1 - Land use management | Stockpiling                                      | Disturbed soil will be amended as required and reinstated as soon as practicable according to EA conditions.                                                                                                                                                                                                                                                                                                                                                                                                                      | As above.                                                                                                                                                                                                                                                                                                                                                                                      |                                                                           | Observation |
|                                | Reinstatement                                    | All disturbed soil shall be reinstated to original profiles as per EA conditions.                                                                                                                                                                                                                                                                                                                                                                                                                                                 | A letter from LandPartners states that land levels were surveyed prior to the commencement of construction, and a follow-up survey was conducted confirming the required specifications and tolerances were met.                                                                                                                                                                               | LandPartners letter signed by Cameron Sly (Project Director) on 19/2/2024 | Acceptable  |
|                                |                                                  | Cleared vegetation to be used as per EA conditions, which may include stockpiling or mulching.                                                                                                                                                                                                                                                                                                                                                                                                                                    | As above.                                                                                                                                                                                                                                                                                                                                                                                      |                                                                           | Observation |
|                                | Rehabilitation                                   | WAPL may be requested to, or may seek instruction to, rehabilitate the site according to EA requirements.                                                                                                                                                                                                                                                                                                                                                                                                                         | As above.                                                                                                                                                                                                                                                                                                                                                                                      |                                                                           | Observation |

|                             |          |
|-----------------------------|----------|
| Acceptable                  | 2        |
| Major non-conformance       | 0        |
| Minor non-conformance       | 0        |
| Observation                 | 7        |
| Opportunity for improvement | 0        |
| Not applicable              | 0        |
| <b>Total</b>                | <b>9</b> |



PRELIMINARY DRAFT WORM Commitments Register (based Jacksons Creek SEMP Rev1, dated 15/11/22)

Auditors attended Jacksons Creek KP 13.8-14

| Document Section                         | Title                                                      | Extract                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Aventus findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Document reference                                                            | Compliant?  |
|------------------------------------------|------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|-------------|
| 6                                        | Melbourne Water Corporation Crossing Conditions            | Any disturbance to areas along a declared waterway reserve or private property must be kept to a minimum and reinstated as near as practicable to its former condition. Reinstatement will include but not limited to the following: <ul style="list-style-type: none"><li>- Backfill, levelling and compaction;</li><li>- Clean-up of site;</li><li>- Re-grading any access tracks;</li><li>- Top soiling and seeding of grassed areas (only if disturbed)</li></ul> | Disturbance to the waterway was avoided by using HDD to install the pipeline at Jacksons Creek.<br><br>The disturbed areas were congruent with surrounding land use at the time of the audit. Inspection reports provided by SPIECAPAG show HDD site reinstatement showing vegetation growth and contours as near as practicable to pre-construction conditions.<br><br>Inspection Report from Melbourne Water (MW) (20/2/2025) verifies watercourses have been inspected. 8 watercourses are completed as satisfactory with 7 requiring reseeded with the next MW inspection due to occur in September 2025 with no mention of reinstatement issues. | Various SPIECAPAG site inspections 2024<br><br>MW inspection report 20/2/2025 | Acceptable  |
| 9                                        | VEGETATION MANAGEMENT TECHNIQUES                           | Vegetation (e.g. riparian vegetation, ground cover, sedges and rushes) cleared as part of the construction will be either be mulched or stockpiled for use during site rehabilitation.                                                                                                                                                                                                                                                                                | Site inspection conducted by SPIECAPAG on 6/06/2024 stated that rock and coir logs were placed within the creek to stabilise where sump and dams were constructed.<br><br>Images supplied through site inspections conducted by SPIECAPAG show rock and coir log placement throughout the revegetation areas. Coir logs were still in place at the time of the audit.                                                                                                                                                                                                                                                                                 | SPIECAPAG site inspection 6/6/2024                                            | Acceptable  |
| 10                                       | SEDIMENT AND EROSION CONTROL                               | SCA's Sodic and Dispersive Soils Management Plan has identified all subsoils along the Project alignment as highly dispersive. All subsoils excavated during works will be ameliorated with Gypsum prior to reinstatement and trench backfill at an application rate of 10kg/m3.                                                                                                                                                                                      | Soil amelioration report supplied by Environmental Soil Solutions Australia Pty Ltd (ESSA) (28 May 2023) indicates that 20kg/m3 of gypsum was applied (report states that this is >10x greater than the commitment).                                                                                                                                                                                                                                                                                                                                                                                                                                  | Environmental Soil Solutions Australia Pty Ltd (ESSA) - 28 May 2023           | Acceptable  |
| 11.1                                     | Flood Warning and Evacuation Management Procedure          | Minimise the area of exposed soils with progressive reinstatement.                                                                                                                                                                                                                                                                                                                                                                                                    | SPA site inspections undertaken on 6/06/2024, 1/08/2024 and 29/08/2024 include images of rehabilitation areas with progressive reinstatement.<br><br>Site inspection conducted by SPIECAPAG stated the creek has been re-established over the relief pit per the original contours with the rocks available used for re-shaping. Vegetation in bentonite affected area were re-established.                                                                                                                                                                                                                                                           | SPIECAPAG site inspections: 6/6/2024<br>1/8/2024<br>29/8/2024                 | Acceptable  |
| 15                                       | PERFORMANCE INDICATORS Sediment and/or vegetative material | Minimise the area of exposed soils with progressive reinstatement.                                                                                                                                                                                                                                                                                                                                                                                                    | As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | As above.                                                                     | Acceptable  |
| Jacksons Creek Rehabilitation Plan Rev C |                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                               |             |
|                                          | Soil Information                                           | Non dispersive clays with heavy organic content and bedrock are present within the work area. SCA will conduct soil testing on sediment within containment dams to classify the soil and determine the absence of contamination. If contamination is identified, CEMP will comply with contamination and waste EMM's within SCA's CEMP.                                                                                                                               | Records have not been sighted to verify SPIECAPAG conducted soil testing on sediment within containment dams to classify the soil and determine the absence of contamination.                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                               | Observation |

|                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                |             |
|----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|-------------|
|                      | <p>Erosion has been minimised during emergency works by SCA reducing ground disturbance as much as reasonably practicable. Protecting existing ground covers and minimising disturbance during rehabilitation will remain a priority.</p>                                                                                                                                                                                                                  | <p>Auditors witnessed the HDD entry and exit sites appeared stable, but were only sighted from a distance.</p> <p>APA advised there were a series of frac-outs, uphill from the creek. Emergency coffer dams were established to manage mud from the frac-outs. As part of the rehabilitation after the removal of coffer dams, sediment curtains were installed and later removed. Several staked in coir logs remain in place in this area. APA advised that these would remain in place as they are biodegradable. There is good cover of pasture growth in this area.</p>                                             |                                                | Acceptable  |
|                      | <p>Erosion protection for rehabilitation will focus on the use of organic and biodegradable blankets and mats to achieve rehabilitation ground coverage targets. SCA will aim to reach 70% ground coverage (0.05 C-Factor) within 10 days of finishing earthworks and on the banks adjacent to Jacksons Creek tributaries and create a low stabilised low flow channel within the tributaries.</p>                                                         | <p>As above.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                | Acceptable  |
| Fencing Requirements | <p>Fencing will be established around the perimeter of the emergency works area immediately after instatement works are finished. The fencing will be electric fencing suitable of keeping cattle out of the reinstated works area. The fencing will be kept in place for a minimum of 12 months unless otherwise agreed. The fencing will only be removed with trilateral agreement between SCA, APA, Melbourne Water Corporation and the Landholder.</p> | <p>Auditors sighted the use of electrical fencing upon entrance to the McKenzie property on the day of the audit. Post-construction began February 2024.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                | Acceptable  |
|                      | <p>11. Stabilisation target of 70% ground coverage within 10 working days from completing earthworks to be achieved by the work schedule.</p>                                                                                                                                                                                                                                                                                                              | <p>All earthworks had been completed prior to the audit. Site inspections between 2023 - 2024 show vegetation ground cover increasing. On the day of the audit, auditors sighted ground cover above 70%.</p> <p><b>Observation</b><br/>Site inspections conducted by SPIECAPAG confirm progressive reinstatement, however there is no confirmation of 70% ground cover within 10 days of earth work completion for the entire pipeline.</p> <p>It is noted that this target is nearly impossible to achieve out-of-season, and the fact that the work was staggered along the pipeline over two years of the program.</p> |                                                | Observation |
|                      | <p>12. Avoid inverting the subsoil and topsoil soil horizons by returning all subsoils to the containment dam and relief pits first before placing topsoil.</p>                                                                                                                                                                                                                                                                                            | <p>On the day of the audit, auditors did not sight any areas of poor grass growth that may have been a result of soil inversion.</p> <p>SPIECAPAG site inspection reports in 2024 did not mention issues regarding soil inversion.</p>                                                                                                                                                                                                                                                                                                                                                                                    | <p>Various SPIECAPAG site inspections 2024</p> | Acceptable  |
|                      | <p>13. Removal of temporary controls will only occur with the site has achieved 70% ground cover and an inspection is undertaken between APA and SCA Environment Team.</p>                                                                                                                                                                                                                                                                                 | <p>Auditors sighted the use of several staked in coir logs remain in this area. APA advised that these would remain in place as they are biodegradable. Emergency coffer dams were established to manage mud from the frac-outs as part of the rehabilitation after the removal of coffer dams, sediment curtains were installed and later removed.</p>                                                                                                                                                                                                                                                                   |                                                | Acceptable  |

|               |                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                 |             |
|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|-------------|
|               | <p>15. The Jacksons Creek Artefact Scatter must be avoided by SCA workers until approval is granted by the RAP to proceed with rehabilitation of the relief pit located within the Cultural Heritage area. Information regarding the location of the Jacksons Creek Artefact Scatter and its management requirements should be recorded in construction pre starts and toolbox talks and signposted onsite.</p> | <p>Site inspection conducted on 6/06/2024 stated fencing or buffer pegs were in place in all work areas observed.</p> <p>Site inspection conducted on 29/08/2024 confirmed that Jacksons creek was re-established over the relief pit per original contours with rock available used for re-shaping and outlined that vegetation in bentonite affected area had re-established.</p> <p><b>Observation:</b><br/>No evidence of RAP approval of rehabilitation of the relief pit has been sighted.</p>                                                                                                                                                                                                                                                                                        | <p>28/8/2024 site inspection</p> <p>6/6/2024 Site inspection</p>                                                                | Observation |
|               | <p>16. The relief pit within the Jacksons Creek Artefact Scatter will be rehabilitated after consultation is undertaken with the RAP. No access to this area will be granted to SCA workers until approval is granted by the RAP and APA.</p>                                                                                                                                                                   | <p>Site inspection conducted on 28/08/2024 - 29/2/2024 confirmed that Jacksons creek was re-established over the relief pit per original contours, rock available used for re-shaping. Vegetation in bentonite affected area has re-established.</p> <p>The Jacksons Rehabilitation Audit supplied by APA outlined that the relief pit was backfilled, bentonite removed as much as practicable. Creek re-established over relief pit per original contours, rock available used for re-shaping. Vegetation in bentonite affected area was re-established.</p> <p>Site inspection conducted on 6/06/2024 stated fencing or buffer pegs were in place in all work areas observed.</p> <p><b>Observation</b><br/>No evidence of confirmation of RAP approval was sighted by the auditors.</p> | <p>Jacksons Rehabilitation Audit</p> <p>SPIECAPAG site inspection on 6/6/2024</p> <p>SPIECAPAG site inspection on 28/8/2024</p> | Observation |
|               | <p>17. When digging small trenches to key in erosion blankets, apply "Unexpected finds procedure – Cultural Heritage" and protect, notify and manage any Cultural Heritage finds.</p>                                                                                                                                                                                                                           | <p>Induction records supplied by Paddock Solutions confirm cultural heritage induction was completed on 3/05/2024.</p> <p>Crew were inducted into Unexpected finds procedure - Cultural Heritage. APA confirmed Cultural heritage sites were fenced and avoided with SPIECAPAG site inspections confirming fencing was placed around cultural sites.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>Paddock Solutions induction records 3/5/2024</p>                                                                             | Acceptable  |
| Work Sequence | <p>1. Recycle and or remove all bentonite and mud as much as reasonably practicable (refer to Staging of Works pg 2) from the Drilling Fluid Containment Area and backfill and reinstate the relief pit and all containment dams / bunds</p>                                                                                                                                                                    | <p>The Jacksons Creek Rehabilitation Audit supplied by APA indicate that the relief pit was backfilled with bentonite removed as much as practicable. Creek re-established over relief pit per original contours, rock available used for re-shaping. Vegetation in bentonite affected area was re-established.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                 | Acceptable  |
|               | <p>2. Reinstate clean water channel through Jacksons Creek tributaries where emergency works has caused ground disturbance.</p>                                                                                                                                                                                                                                                                                 | <p>Inspections undertaken on 6/06/2024, 1/08/2024 and 29/08/2024 indicate rehabilitation of the site with contours being reinstated and areas where emergency works</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>Site Inspections<br/>6/06/2024<br/>1/08/2024<br/>29/08/2024</p>                                                              | Acceptable  |

|  |                            |                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                        |                |
|--|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|----------------|
|  |                            | <p>3. Prepare surfaces of all banks where emergency works has caused disturbance or loose soil is present. Where no ground cover is present, seeding per Property Management Plan requirements will be undertaken.</p>                                                                                                                     | <p>were undertaken have been seeded with vegetation growth present.</p> <p>Auditors sighted reinstatement of the tributary to the creek was as close to the pre-construction state as possible.</p> <p>As part of the rehabilitation after the removal of coffer dams, sediment curtains were installed and later removed. Several staked in coir logs remain in place in this area. APA advised that these would remain in place as they are biodegradable. There is good cover of pasture growth in this area.</p>                                                                                                                                                                                                                                                                                                                                                                                                                      |                                        | Acceptable     |
|  |                            | <p>4. Working from the Relief Pit Area towards the Landholder Access Track, return topography to existing contours, roughen surface and seed disturbed areas.</p>                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                        | Acceptable     |
|  |                            | <p>5. Monitor the site weekly during the first 6 weeks after rehabilitation. If seed fails to germinate within 6 weeks discussion with APA, SCA and Landholder to be undertaken to determine whether planting schedule is required to be implemented (note, plantings may be used in discrete areas where no ground cover is present).</p> | <p>The APA Environmental Advisor advised that rainfall in the area was adequate to promote seed growth.</p> <p><b>Observation</b><br/>No inspection records are in place to confirm rainfall records after seeding. The auditors recollect 2024 was a wet year and that it was wet during pipeline construction and rehabilitation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | McKenzie property inspection 25/9/2024 | Observation    |
|  | Maintenance and Monitoring | <p>1. All erosion and sediment controls are to be inspected daily during works</p>                                                                                                                                                                                                                                                         | <p>Site inspection reports by SPIECAPAG do not contain prompts regarding daily erosion and sediment control inspections.</p> <p>Site inspection conducted by SPIECAPAG on 29/08/2024, confirmed that no erosion has been observed on Wildwood slope. Significant coverage of vegetation is sighted to stabilise the soil, berms remain in place to direct water across RoW and slow velocity and avoid erosion.</p> <p>Auditors sighted biodegradable erosion barriers in place to help prevent loss of vegetation.</p> <p>APA advised there were a series of frac-outs, uphill from the creek. Emergency coffer dams were established to manage mud from the frac-outs.</p> <p>As part of the rehabilitation after the removal of coffer dams, sediment curtains were installed and later removed. Several staked in coir logs remain in place in this area. APA advised that these would remain in place as they are biodegradable.</p> | SPIECAPAG site inspection 29/8/2024    | Observation    |
|  |                            | <p>2. All mud return systems will be inspected daily during works and TARPS will comply with the Jacksons Creek Site Specific Environmental Management Plan.</p>                                                                                                                                                                           | <p>This is applicable to the construction phase.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                        | Not applicable |
|  |                            | <p>3. Ensure drains and sediment controls are free of debris and cleaned of excess silt.</p>                                                                                                                                                                                                                                               | <p>During the audit, auditors sighted biodegradable erosion barriers (coir logs) were in place upslope of the creek to minimise soil erosion. These ESC devices were free of debris.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                        | Acceptable     |

|  |                   |                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                    |                |
|--|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|----------------|
|  |                   | 4. Monitoring the site weekly after seeding to determine if appropriate ground cover is being achieved or plantings are required                                                                                                                                       | Site inspections conducted by SPIECAPAG in 2024 confirm ground coverage was progressively reinstated.<br>The APA Environmental Advisor confirmed weekly inspections of the site had occurred however, records of these inspections would not usually be formally noted unless issues were found.<br><br><b>Observation</b><br>Site inspections provided were inconsistent (1 -3 per month throughout 2024)                                        | Various SPIECAPAG site inspection records in 2024. | Observation    |
|  |                   | 5. Continue to monitor the site monthly for 12 months post rehabilitation with focus on weed management, replanting / reseeding areas with no / low ground cover.                                                                                                      | A sample of site inspection reports have been obtained, the 12 month period will conclude in February 2025. Given the rehabilitation period is still in progress, the 12 month inspection is yet to be completed and the next audit will capture the 12 month commitment.<br><br><b>Observation</b><br>The reports do not specifically say they are monthly inspection reports. There is no way to verify that monthly monitoring was undertaken. | Various SPIECAPAG site inspection records in 2024. | Observation    |
|  | Inspection        | 1. Rehabilitation works within the watercourse must be completed to the satisfaction of Melbourne Water Corporation. A site inspection should be organised with Melbourne Water's Waterway and Land Officer following rehabilitation of the site (APA responsibility). | No waterwork occurred within Jackson creek as the site was HDD.                                                                                                                                                                                                                                                                                                                                                                                   |                                                    | Not applicable |
|  | Planting schedule | If planting of native vegetation is undertaken the below planting schedule should be used to assist the selection of native species to be planted within the waterway and on the adjacent slopes (Embankment Plantings).                                               | The APA Environmental Advisor confirmed no native vegetation was planted at site, verified through this audit, therefore not applicable.                                                                                                                                                                                                                                                                                                          |                                                    | Not applicable |

| Percentage Total            |           |     |
|-----------------------------|-----------|-----|
| Acceptable                  | 16        | 59% |
| Major non-conformai         | 0         | 0%  |
| Minor non-conformai         | 0         | 0%  |
| Observation                 | 8         | 30% |
| Opportunity for improvement | 0         | 0%  |
| Not applicable              | 3         | 11% |
| <b>Total</b>                | <b>27</b> |     |



PRELIMINARY DRAFT WORM Commitments Register (based on Merri Creek SEMP Rev1, dated 28/11/22)

KP 42 – Merri Creek crossing

| Document Section | Title               | Extract                                                                                                                                                                                                                                                                                     | Aventus comments/findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Document reference                                                                                 | Compliant? |
|------------------|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|------------|
| 1.2.1            | Approvals           | Prior to the commencement of works a rehabilitation plan must be endorsed by DELWP showing all disturbed areas within Conservation Areas to be rehabilitated. The rehabilitation plan must include:<br>- Provision for on-going weed management until effective cover has been established. | The document control page of the Site Specific Environment Management Plan – Merri Creek (18035-PL-HSE-0028 Rev 1) says it was accepted by DELWP on 28/11/2022. No formal letter of endorsement from DELWP has been sighted.                                                                                                                                                                                                                                                                  | Merri Creek SEMP                                                                                   | Acceptable |
| 1.2.2            | Compliance Measures | Prepare a Management Plan for Merri Creek which includes a Rehabilitation Plan                                                                                                                                                                                                              | Section 13 of the Merri Creek SEMP (18035-PL-HSE-0028 Rev 1) outlines the reinstatement and rehabilitation plan.                                                                                                                                                                                                                                                                                                                                                                              | Merri Creek SEMP                                                                                   | Acceptable |
|                  |                     | Prepare a Site Rehabilitation Plan for revegetation of native vegetation within the construction area.                                                                                                                                                                                      | Section 13.2 of the Merri Creek SEMP (18035-PL-HSE-0028 Rev 1) outlines revegetation of native vegetation within the construction area.                                                                                                                                                                                                                                                                                                                                                       | Merri Creek SEMP                                                                                   | Acceptable |
|                  |                     | The rehabilitation plan shall be prepared in consultation with each landholder and in accordance with any agreement made as part of easement negotiations.                                                                                                                                  | Emails and the PMP signoff register confirm APA has worked closely with the Merri Creek landowner both prior to reinstatement and during defect repair works. Furthermore, the Merri Creek SEMP was developed in consultation with the landholder and in accordance with agreements made during easement negotiations                                                                                                                                                                         | Emails between APA and the Merri Creek landowner dated 11/8/2022, 8/9/2022, 14/9/2022 and 7/4/2025 | Acceptable |
|                  |                     | The rehabilitation plan is to be verified by a qualified and experienced bushland restoration land management contractor.                                                                                                                                                                   | Appendix C of the Rehab Plan provides the verification by Lucas Piperides, a qualified and experienced bushland restoration land management contractor.<br><br>The achievements & certificates of Lucas Piperides include:<br>- Bachelor of Built Environment (Landscape Architecture)<br>- Bachelor of Construction Management<br>- Certificate II and III in Landscape Construction<br>- Diploma in Horticulture<br>- Certificate IV in OH & S<br>- Site Supervisor BSA License No: 1236547 | Merri Creek SEMP                                                                                   | Acceptable |
|                  |                     | Revegetation with native vegetation is to be undertaken in accordance with the Rehabilitation Plan.                                                                                                                                                                                         | Invoices supplied by Prestige Plants Australia Pty Ltd confirm the use of native vegetation where required.<br><br>Invoice from Prestige Plants Australia Pty Ltd (24/5/2024) provide plants including:<br>Carex appressa, Carex tereticaulis, Juncus usitatus<br>Lomandra longifolia, Microlaena stipoides, Poa labillardieri, Themeda triandra.                                                                                                                                             | Invoice from Prestige Plants Australia Pty Ltd - 24/5/2024                                         | Acceptable |
|                  |                     | The Rehabilitation Plan is to include any specific monitoring requirements and contingency measures for addressing potential rehabilitation issues such as weed invasion and sodic and dispersive soils, as they arise.                                                                     | Section 6 of the Merri Creek SEMP outlines potential issue management related to weed, biosecurity, phytophthora and Chytrid Fungus introduction, while sodic and dispersive soils are outlined in section 5.3. Section 14 outlines monitoring requirements.                                                                                                                                                                                                                                  | Merri Creek SEMP                                                                                   | Acceptable |

|       |                            |                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                   |             |
|-------|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| 3     | ROLES AND RESPONSIBILITIES | SCA's Specialist Environmental Contractor is to undertake all rehabilitation activities within Conservation Area 34 in accordance with the rehabilitation plan requirements of this SSEMP – Merri Creek.                                                                                                                                                                    | <p>HL Landscaping is contracted for Project Management, Supervision, Establishment etc, waterway planting, embankment planting and maintenance.</p> <p>Maintenance records by HL Landscapes state weed spraying and insecticide applications occurred on 26/06/2024.</p> <p>MELBOURNE FARM SUPPLIES P/L supplied the pasture seeds including: SPS pipeline mix, PS Rygrass Kingsgate Bare and PS Temora Tall Fescue.</p> <p>The auditors sighted planting of native species as tubestock along the banks of Merri Creek, with sediment and erosion control measures are in place along the banks of the creek in accordance with the SSEMP.</p> <p>Soil amelioration report supplied by Environmental Soil Solutions Australia Pty Ltd (ESSA) (28 May 2023) indicates that a minimum of 20kg/m3 of gypsum was added.</p>                        | <p>HL Landscapes maintenance record - 26/06/2024.</p> <p>SPIECAPAG site inspections - 2024</p>                                                                                                    | Acceptable  |
| 4     | Merri Creek                | <p>SCA will reduce construction impacts on Merri Creek as far as reasonably practicable by:</p> <p>Implementing the Reinstatement and Rehabilitation Plan (see Section 13.0, below)</p>                                                                                                                                                                                     | <p>Site inspections conducted by SPIECAPAG are in line with the SSEMP</p> <p>The rehabilitation line list included the required actions to be undertaken in accordance with the SSEMP.</p> <p>Soil amelioration report supplied by Environmental Soil Solutions Australia Pty Ltd (ESSA) (28 May 2023) indicates that 20kg/m3 of gypsum was applied (report states that this is &gt;10x greater than the commitment).</p> <p>Maintenance records by HL Landscapes state weed spraying and insecticide applications occurred on 26/06/2024.</p> <p>Auditors sighted no significant weed growth at Merri Creek on 22/10/2024. The auditors sighted planting of native species as tubestock along the banks of Merri Creek, with sediment and erosion control measures are in place along the banks of the creek in accordance with the SSEMP.</p> | <p>Environmental Soil Solutions and ALS Laboratory amelioration report</p> <p>HL Landscapes maintenance records</p> <p>SPIECAPAG site inspections 2023 - 2024</p> <p>Rehabilitation line list</p> | Acceptable  |
|       |                            | Control the dispersal and growth of weed species within Merri Creek during and post-construction.                                                                                                                                                                                                                                                                           | <p>Maintenance invoice by HL Landscapes and PADDOCK solutions state weed spraying and insecticide applications occurred on:</p> <p>boom spray, chemical knockdown - 4/5/2024</p> <p>Slash - 9/5/2024</p> <p>Spraying - 6/5/2024</p> <p>The auditors sighted no significant weed growth at Merri Creek.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | HL Landscapes maintenance records                                                                                                                                                                 | Acceptable  |
| 5.3   | Sodic and dispersive soils | SCA will conduct soil amelioration for trench backfill in accordance with the Sodic and Dispersive soils Management Plan (18035-PL-CN-0011) and ameliorate subgrade (subgrade is the soil horizon beneath topsoil) and topsoil in accordance with the soil amelioration rates identified in Property Management Plans (PMP for Property 1 LP38239 and Property 1 TP709759). | Soil amelioration report supplied by Environmental Soil Solutions Australia Pty Ltd (ESSA) (28 May 2023) indicates that 20kg/m3 of gypsum was applied (report states that this is >10x greater than the commitment).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Environmental Soil Solutions Australia Pty Ltd (ESSA) ALS Services report (28 May 2023)                                                                                                           | Acceptable  |
| 5.3.1 | Soil Amelioration Rates    | <p>Trench Spoil = 10kg of gypsum per cubic metre of spoil</p> <p>Subgrade = 2 ton of gypsum per hectare</p> <p>Topsoil = 2 ton of lime per hectare</p>                                                                                                                                                                                                                      | Auditors did not sight evidence to support trench spoil was ameliorated.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                   | Observation |

|     |                 |                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                       |                             |
|-----|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|-----------------------------|
|     | Soil Monitoring | Soil amelioration will also be monitored through chemical soil analysis (soil amelioration analysis). Soil amelioration analysis will be undertaken in a linear progression along the construction RoW to verify the soil has been ameliorated with the correct quantity of required ameliorant. Soil ameliorant analysis will be conducted per the Sodic and Dispersive Soils Management Plan.     | Soil amelioration report supplied by Environmental Soil Solutions Australia Pty Ltd (ESSA) (28 May 2023) confirms soil at Merri Creek was treated with the correct quantity of ameliorant. Soil analysis was undertaken by ALS.                                                                                                                                                                                                                                                                                                                                                                                                          | Environmental Soil Solutions Australia Pty Ltd and ALS Laboratory amelioration report | Acceptable                  |
| 5.4 | Geoheritage     | Where removal of basalt boulders is required, they will be moved as an intact body and replaced in the same orientation and geometry either in the initial position or as close as practicable to that position.                                                                                                                                                                                    | The auditors sighted that the rocks removed at the Merri Creek crossing were put back as close as practical to their pre-construction position.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                       | Acceptable                  |
|     |                 | Construction of the Merri Creek crossing will occur during minimal or no channel flow. All introduced obstructions to flow after the pipe has been laid and backfilled will be removed. The existing channel and bank dimensions—width, gradient and depth, will be re-established after construction. Excess introduced construction materials will be removed once construction is completed.     | Auditors sighted width, gradient and depth, has been re-established after construction to pre-construction conditions. There was no visual evidence of excess introduced construction materials remaining in place.                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                       | Acceptable                  |
| 6.1 | Weed Management | Any weeds identified in Conservation Areas will be added to the Environmental Line List to prompt maintenance during reinstatement and rehabilitation.                                                                                                                                                                                                                                              | Maintenance invoice by HL Landscapes and PADDOCK solutions state weed spraying and insecticide applications occurred at the Merri Creek conservation area on:<br>boom spray, chemical knockdown - 4/5/2024<br>Slash - 9/5/2024<br>Spraying - 6/5/2024<br><br>Priority weeds have been outlined in section 13.9.1 of the Merri Creek SSEMP. Site inspections conducted by SPIECAPAG do identify weed species.<br><br><b>OFI</b><br>The auditors were supplied with the Rehabilitation line list, which does not identify weeds in conservation areas. Furthermore, the Environmental Line List does not contain any weeds at Merri Creek. |                                                                                       | Opportunity for improvement |
| 8.1 | Wet Work Area   | Backfill the trench, compact the trench, return the contours of Merri Creek to their original condition as far as reasonably practicable.                                                                                                                                                                                                                                                           | The auditors sighted Merri Creek rehabilitation had occurred with the creek being returned to pre-construction contours as far as reasonably practicable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                       | Acceptable                  |
|     |                 | Rehabilitate and stabilise Merri Creek as soon as construction is complete within the construction footprint (with the exception of the Merri Creek access track).                                                                                                                                                                                                                                  | The auditors sighted Merri Creek stabilisation has occurred with rock check used to stabilise the creek banks.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                       | Acceptable                  |
|     |                 | Maintain a stable access track through Merri Creek with appropriate erosion and sediment controls and adequate flow diversions.                                                                                                                                                                                                                                                                     | Relevant to construction only.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                       | Not applicable              |
|     |                 | Rehabilitate and stabilise work area with exception of the access track. Rehab standards will reflect the site conditions at the time of rehabilitation.                                                                                                                                                                                                                                            | While this commitment discusses rehabilitation, it applies to the construction phase because of the exception regarding the access track.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                       | Not applicable              |
|     |                 | Remove pumps and allow water to flow.                                                                                                                                                                                                                                                                                                                                                               | There were no water pumps in place at the creek at the time of the audit.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                       | Acceptable                  |
|     |                 | Once access is no longer required across Merri Creek, SCA will remove and rehabilitate the access track area by:<br>Installing pump upstream of access track and begin pump bypass around work area.<br>Dewatering will occur per WORM Overarching Erosion and Sediment Control Plan and Trench Dewatering Plan which requires the dewatering release point to be over 100m away from watercourses. | The access track was no longer in place at the time of the audit, nor was there any visual indication that the track existed, indicating successful rehabilitation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                       | Acceptable                  |
|     |                 | Installing upstream and downstream erosion and sediment controls depending on level of water present in Merri Creek (determined by CPESC Erosion and Sediment Control Plan to be developed prior to works).                                                                                                                                                                                         | Site inspection by SPIECAPAG on 28/02/2024 confirmed erosion control measures were implemented.<br><br>Site inspection by SPIECAPAG on 9/05/2024 stated that berms are in place, stabilised site by using the original rocks and trees from the site.<br><br>On the day of the audit, auditors sighted berms were in place with rocks and trees used to stabilise and promote rehabilitation.                                                                                                                                                                                                                                            | SPIECAPAG site inspections 28/2/2024 and 9/5/2024.                                    | Acceptable                  |
|     |                 | Remove access track material and any flume pipes.                                                                                                                                                                                                                                                                                                                                                   | The access track and flume pipe was no longer in place at the time of the audit.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                       | Acceptable                  |

|    |  |                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                       |             |
|----|--|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|-------------|
|    |  | Regrade the contours of Merri Creek to pre-construction conditions as much as reasonably practicable.                                                                                                                                                                                                                                                                                            | Site inspection by SPIECAPAG on 28/02/2024 display remedial works being undertaken aligning closely with the SSEMP.<br><br>At the time of the audit, the contours of Merri Creek bed and banks matched the upstream and downstream profile of the creek.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | SPIECAPAG site inspection 28/2/2024, 9/5/2024                                         | Acceptable  |
|    |  | Rehabilitation and stabilise the area.                                                                                                                                                                                                                                                                                                                                                           | Site inspection by SPIECAPAG on 28/02/2024 confirmed erosion control measures were implemented. Donnybrook Rd (positive). KP 30.15 to KP earthen erosion control spoon drains installed diagonally across the RoW at a spacing ~20m on slope to minimise surface-water runoff. Some scour of the backfilled pipe easement was observed.<br><br>Site inspection by SPIECAPAG on 6/03/2024 confirmed rehabilitation and reinstatement was on going, jute matting installed with edges keyed in with rock, proximal to the high water level on the north bank. Relic tree trunk segments were placed. Matting placed (pinned), still to be covered with rock and soil as the final stage of rehabilitation.<br><br>Additional monthly site inspections by SPIECAPAG verify that rehabilitation works stabilised the site.<br><br>The auditors sighted rehabilitation of Merri Creek aligns closely with the SSEMP with reed and grass growth in place topsoil and deposition of silt in voids to the placed rock fill material. Berms are in place, original rocks and trees from the site stabilised the site. | SPIECAPAG site inspection 28/2/2024, 6/3/2024 and 3/4/2024, 9/5/2024                  | Acceptable  |
|    |  | Remove erosion and sediment controls and pumps.                                                                                                                                                                                                                                                                                                                                                  | ERSED controls and pumps were no longer in place in the creek at the time of the audit. However, erosion controls (e.g., berms) remain in place on the creek banks.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                       | Acceptable  |
|    |  | Once construction access is no longer required through Merri Creek: Rehabilitate and stabilise Merri Creek.                                                                                                                                                                                                                                                                                      | Site inspection conducted on 28/02/2024 confirmed Merri Creek reinstatement works (including trench backfill) were completed on 28 and 29 February 2024. February 2024 therefore marks the beginning of the rehabilitation period at this location.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | SPIECAPAG site inspection 28/02/2024                                                  | Acceptable  |
| 10 |  | Stockpiles within Conservation Area 34 left for over 28 days will be stabilised with soil binder or rye grass.                                                                                                                                                                                                                                                                                   | The APA Environmental Advisor outlined that only rock for the batter and toe armouring had taken place which required no stabilisation.<br><br><b>Observation</b><br>The site inspection reports do not prompt stockpile stabilisation inspection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                       | Observation |
| 10 |  | <u>Sodic Soil and Ground Movement Management Measures</u><br>SCA will use gypsum and pH adjusters (e.g. lime) to ameliorate topsoils and subgrade per Property Management Plans.<br>In general, the following ameliorants will be applied to the soils stripped and excavated from watercourse and drainage lines:<br>Gypsum applied at 2kg/ha to subgrade<br>Lime applied at 1kg/ha to topsoils | Soil amelioration report supplied by Environmental Soil Solutions Australia Pty Ltd (ESSA) (28 May 2023) indicates that 20kg/m3 of gypsum was applied (report states that this is >10x greater than the commitment).<br><br>The rehabilitation line list supplied by SPIECAPAG confirmed Ag lime was to be applied at a rate of 1kg/m3.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Environmental Soil Solutions Australia Pty Ltd and ALS Laboratory amelioration report | Acceptable  |
| 10 |  | <u>Sodic and dispersive soils identified in the Sodic and Dispersive Soils Management Plan</u> will be ameliorated with gypsum to reduce the Exchangeable Sodium Percentage (ESP) to approximately 4% or less and / or cap dispersive soils with a 300mm layer of non-dispersive soil.                                                                                                           | As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                       | Acceptable  |

|      |                     |                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                       |                |
|------|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| 13.2 | Rehabilitation Plan | Merri Creek Conservation Area will be rehabilitated with native vegetation common to the areas Ecological Vegetation Classes (EVC) to promote the return of native flora and fauna.      | <p>Tubestock planting with native species took place 25/5/2024, completed by LH Landscapes.</p> <p>Invoice from Prestige Plants Australia Pty Ltd (24/5/2024) indicates that the species planted were:<br/> <i>Carex appressa</i>, <i>Carex tereticaulis</i>, <i>Juncus usitatus</i><br/> <i>Lomandra longifolia</i>, <i>Microlaena stipoides</i>, <i>Poa labillardieri</i>, <i>Themeda triandra</i>.</p> <p><b>OFI</b><br/> The LH Landscape report does not make it clear that the species planted are part of the EVCs relevant to this area. This being said, the Lead Auditor recognises that the species planted are native to this region.</p> | HL Landscapes maintenance records                                                                                                                                                     | Acceptable     |
|      |                     | Weeds will be managed during construction and during SCA's 24-month defect liability period post-construction to minimise the opportunity for weeds to outcompete the native vegetation. | <p>Maintenance invoice by HL Landscapes and PADDOCK solutions state weed spraying and insecticide applications occurred at the Merri Creek conservation area on:<br/> boom spray, chemical knockdown - 4/5/2024<br/> Slash - 9/5/2024<br/> Spraying - 6/5/2024</p> <p>The auditors noted there was very little weed coverage in the pasture grass on the banks of the creek.</p>                                                                                                                                                                                                                                                                      | HL Landscapes maintenance records                                                                                                                                                     | Acceptable     |
|      |                     | SCA will implement the following rehabilitation procedure as soon as practicable post-construction:<br>1. Apply gypsum to subgrade (if not already applied) at a rate of 2 ton / Ha.     | Soil amelioration report supplied by Environmental Soil Solutions Australia Pty Ltd (ESSA) (28 May 2023) indicates that 20kg/m3 of gypsum was applied (report instigates that this is >10x greater than the commitment).                                                                                                                                                                                                                                                                                                                                                                                                                              | Environmental Soil Solutions Australia Pty Ltd and ALS Laboratory amelioration report                                                                                                 | Acceptable     |
|      |                     | 2. Rip subgrade compacted by construction activities within Merri Creek                                                                                                                  | The monthly inspection conducted by SPIECAPAG on 18/07/2024 displayed photographic evidence of soil ripping where construction has occurred.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | SPIECAPAG site inspection 18/7/2024                                                                                                                                                   | Acceptable     |
|      |                     | 3. Respread topsoil stripped from the area with 2 ton / Ha of agricultural lime mixed into the topsoil.                                                                                  | Rehabilitation line list supplied by SPIECAPAG outlines the the addition of 2 ton / Ha of agricultural lime to the topsoil. The amelioration report does not indicate that lime was applied at the Merri Creek location. The Merri Creek rehabilitation audit report, on the other hand, states that lime was applied. The APA Environmental Advisor has stated that the SPIECAPAG site foreman (G. Laurent) was present on the day of agricultural lime being added to the site.                                                                                                                                                                     | <p>SPIECAPAG Merri Creek Rehabilitation Audit report</p> <p>Rehabilitation line list</p> <p>Environmental Soil Solutions Australia Pty Ltd and ALS Laboratory amelioration report</p> | Acceptable     |
|      |                     | 4. Conduct an initial weed knock down spray on the topsoil prior to seeding / planting.                                                                                                  | <p>The auditors assume that reinstatement and rehabilitation on the part of the easement adjacent to the Merri Creek crossing occurred during March 2024 based on records available. However, the only records available that mention weed spraying are dated 26/6/2024.</p> <p>The APA Environmental Advisor stated that an initial weed spray was not required prior to planting as planting occurred within a week of earthworks completion resulting in no weed growth occurring.</p>                                                                                                                                                             | HL Landscapes maintenance records                                                                                                                                                     | Acceptable     |
|      |                     | 5. Plant tubestock in to topsoil and apply suitable fertiliser to topsoil.                                                                                                               | <p>HL Landscapes provided records outlining tubestock planting took place on 25/5/2024.</p> <p>The auditors sighted tubestock in place planted along the banks of the creek. APA advised further tubestock planting will occur.</p>                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>HL Landscapes maintenance records</p> <p>SPIECAPAG site inspection 3/04/2024</p>                                                                                                   | Acceptable     |
|      |                     | 6. Water tubestock weekly post-planting for 3 months during the establishment period.                                                                                                    | Maintenance record reports by HL Landscapes confirm attempts to water tubestock occurred however, due to persistent wet weather after planting, no access was possible nor was watering required.                                                                                                                                                                                                                                                                                                                                                                                                                                                     | HL Landscapes maintenance records                                                                                                                                                     | Not applicable |

|      |                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                      |                             |
|------|------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
|      |                        | 7. Commence weed monitoring immediately following planting and maintain weed management throughout defect liability period.                                                                                                                                                                                                                                                                                                                                                                                                        | The Merri Creek rehabilitation audit report supplied by APA confirms that watering and weed management has been completed by sub contractor HL Landscapes for 12 months with weed invoices confirming weed control occurred at Merri Creek.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Merri Creek Rehabilitation Audit Report                                                                                                                                                              | Acceptable                  |
| 13.3 | Tubestock Revegetation | <p>The Establishment Period will occur for 3 months post-planting. The following operations will be undertaken during the establishment period:</p> <ul style="list-style-type: none"> <li>- watering</li> <li>- fertilising</li> <li>- weed control</li> <li>- pest and disease control</li> <li>- protection of vegetation works</li> <li>- mowing, slashing and brush cutting</li> <li>- pruning</li> <li>- selective removal of non-complying plants</li> <li>- monthly inspection reporting.</li> </ul>                       | <p>Tubestock were planted at some point during May 2024. The establishment period is therefore June, July and August 2024.</p> <p>Maintenance invoice by HL Landscapes and PADDOCK solutions state weed spraying and insecticide applications occurred on:</p> <p>boom spray, chemical knockdown - 4/5/2024<br/>Slash - 9/5/2024<br/>Spraying - 6/5/2024</p> <p>Samples of HL Landscape maintenance record reports include weed monitoring have been sighted by auditors between 25/5/2024 and 20/8/2024. In July 2024 conditions were too wet for inspection.</p> <p><b>Observation</b><br/>Paddock Solutions runsheets and HL Landscapes maintenance reports do not include information on pruning, mowing, watering and the removal of non-compliant plants.</p>                                                                                                                                                                                                                                                                                                                                                                              | HL Landscape maintenance record reports dated 25/5/2024 and 20/8/2024.                                                                                                                               | Observation                 |
|      |                        | <p>APA and SCA will undertake an inspection of Merri Creek after the 3 month establishment period. The following criteria will be used during the inspection and if satisfactory, Merri Creek rehabilitation will enter the Monitoring period. The Establishment Period will be completed if:</p> <ol style="list-style-type: none"> <li>1. the area is weed free</li> <li>2. the tubestock has a survival rate over 80%. If the survival rate is not achieved, tubestock will be replanted to meet 4 tubestock per m2.</li> </ol> | <p>Post-construction began in February 2024. Therefore, the 3 month establishment period is March - May 2024.</p> <p>Maintenance invoice by HL Landscapes and PADDOCK solutions state weed spraying and insecticide applications occurred on:</p> <p>boom spray, chemical knockdown - 4/5/2024<br/>Slash - 9/5/2024<br/>Spraying - 6/5/2024</p> <p>These records demonstrate actions were taken during the establishment period to keep the site weed free.</p> <p>Samples of HL Landscape maintenance record reports include weed monitoring, dated 25/5/2024 and 20/8/2024. The reports state that conditions in July 2024 were too wet to gain access for inspection.</p> <p><b>Observation/OFI</b><br/>Further inspection reports dated 15/4/2025 and 8/5/2025 demonstrate ongoing monitoring of this site. APA advised that additional inspections occurred but were not properly recorded.</p> <p>The links to the photos associated with these reports indicates near zero survival rate for tubestock planted at Merri Creek. APA has advised that maintenance will occur in spring 2025 to undertake additional tubestock planting.</p> | <p>HL Landscapes 2025 Merri Creek reports (15/4/2025 and 8/5/2025) with hyperlink to photos posted at ezygm.com.au</p> <p>HL Landscape maintenance record reports dated 25/5/2024 and 20/8/2024.</p> | Opportunity for improvement |
|      |                        | The Monitoring Period will occur after the requirements of the Establishment Period are met until the defect liability period. During the Monitoring Period, SCA will undertake quarterly inspections of the site which will cover weed management, watering, fertilising and vegetation protection.                                                                                                                                                                                                                               | The monitoring period is September 2024 until the end of February 2026. No quarterly inspection reports have been sighted, noting that this audit took place in October 2024.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                      | Not applicable              |
|      |                        | Quarterly inspections will be undertaken during the Monitoring Period which will be used to action any weed management, watering or vegetation management actions required to meet the rehabilitation target of >80% survival rate of the tubestock planted within and on the banks of Merri Creek.                                                                                                                                                                                                                                | As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                      | Not applicable              |

|      |                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                      |                |
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| 13.4 | Grass Ground Cover Targets | <p>SCA commit to aiming to achieve 70% grass ground cover at 12 months and 75% ground cover at 24 months during the defect liability period.</p> <p>SCA will conduct an inspection of the rehabilitated area 12 months and 24 months during the rehabilitation period. Using a visual assessment of groundcover (Agriculture Victoria) as the monitoring tool, SCA will record the percentage of ground cover within the rehabilitated area.</p>                                     | <p>Site inspection conducted by SPIECAPAG on 14/08/2024 determined the vegetation coverage to be above 70% six months post-reinstatement (28/02/2024 - 29/02/2024).</p> <p>The 24 month period will conclude in February 2026. Given the rehabilitation period is still in progress, the 24 month inspection is yet to be completed and the next audit will capture the 24 month commitment.</p>                                                                                                                                     | SPIECAPAG site inspection 14/08/2024 | Acceptable     |
|      |                            | <p>If the ground cover does not meet the % ground cover at the 12 month or 24 month inspection, SCA will re-seed areas not meeting target ground cover and follow the Reinstatement and Rehabilitation Plans for watering and weeding. If SCA do not meet revegetation targets after re-seeding, an agronomist will be engaged to plan and implement rehabilitation.</p>                                                                                                             | <p>Site inspection conducted by SPIECAPAG on 14/08/2024 determined the ground coverage to be above 70%, 6 months post reinstatement therefore, not applicable.</p>                                                                                                                                                                                                                                                                                                                                                                   | SPIECAPAG site inspection 14/08/2024 | Not applicable |
| 13.5 | Tubestock Planting         | <p>Tubestock will be planted within the waterway and banks of Merri Creek in two planting zones. All plants to be of local provenance to the Merri Creek and Western Plains Catchment.</p> <p>Planting zones will consist of 'Waterway Plantings' within Merri Creek's low flow channel and 'Embankment Planting' which will be planting with jute matting on Merri Creek's banks.</p> <p>The planting zones with their planting schedules are described in <b>Section 13.5</b>.</p> | <p>Waterway planting occurred within Merri Creek's low flow channel by HL Landscapes in May 2024. 125 m2 of 50mm virotube at 4 plants per m2 were planted.</p> <p>Emabnkment planting along Merri Creek in May 2024 by HL Landscapes. 600m2 of 50mm Virotube @ 6 plants per m2, excluding soil was planted &amp; 700gsm slitted jute matting were placed. The auditors sighted that jute matting was used along the embankment under the rock check.</p> <p>See earlier finding regarding local provenance of tubestock species.</p> | HL Landscapes records                | Acceptable     |
| 13.6 | Seed Mix                   | <p>To meet like-for-like rehabilitation at Merri Creek, the pasture grass seed mix will contain perennial rye and fescue chosen to suit the climatic conditions. The pasture seed mix proposed is detailed in <b>Section 13.6</b>.</p> <p>Note, seed mix has been chosen in consultation with an Agronomist from DLF Seeds.</p>                                                                                                                                                      | <p>MELBOURNE FARM SUPPLIES P/L supplied the seeds which included:<br/>SPS PIPELINE MIX<br/>PS RYEGRASS KINGSGATE BARE<br/>PS TEMORA TALL FESCUE</p> <p>These are the same species as specified in section 13.6 of the SSEMP.</p>                                                                                                                                                                                                                                                                                                     | MELBOURNE FARM SUPPLIES P/L records  | Acceptable     |
| 13.7 | Fertiliser                 | <p>SCA will use a suitable fertiliser to encourage plant growth in Merri Creek. Generally, the fertiliser will have the following ranges:<br/>Nitrogen: 7-22<br/>Phosphorus: 1-6<br/>Potassium ranges: 2-10</p>                                                                                                                                                                                                                                                                      | <p>Rehabilitation line list has been provided by SPIECAPAG outlining fertiliser application rates of 100kg/H with a N/P/K ratio within:<br/>Nitrogen: 7-22<br/>Potassium: 1-6<br/>Phosphorus: 2-10</p> <p>The auditors have not sighted documentation to verify fertiliser application at the above listed nutrient ratios.</p>                                                                                                                                                                                                      | SPEECAPAG Rehabilitation line list   | Observation    |
| 13.8 | Watering                   | <p>SCA will water the entire Merri Creek area being planted with tubestock within 1 week of planting to stimulate plant growth.</p>                                                                                                                                                                                                                                                                                                                                                  | <p>As listed earlier, native tubestock was planted in May 2024. Auditors did not sight evidence to support watering occurred within 1 week of planting at Merri Creek.</p>                                                                                                                                                                                                                                                                                                                                                           |                                      | Observation    |
|      |                            | <p>SCA will monitor the weather forecast and if inadequate rainfall falls (&lt;5mm per month), SCA will consider watering Merri Creek with potable water to assist plant growth. Limitations on watering include access and damage to the RoW from accessing Merri Creek.</p>                                                                                                                                                                                                        | <p>Auditors have not sighted evidence of weather forecast monitoring or watering of tubestock.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                   | HL Landscapes maintenance records    | Observation    |
| 13.9 | Weed Monitoring            | <p>To conserve as far as reasonably practicable the pre-construction condition of Merri Creek and increase the success of rehabilitation, SCA will engage a weed spraying contractor to undertake regular weed maintenance spraying within Conservation Areas.</p>                                                                                                                                                                                                                   | <p>HL Landscapes is contracted to undergo regular weed spraying and maintenance as required.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                     | HL Landscapes maintenance records    | Acceptable     |

|        |                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                   |                             |
|--------|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------|
|        |                         | The weed spraying contractor will ultimately determine the timing of the weed sprays to coincide with the best conditions for weed spraying. Generally, SCA will commit to weed spraying quarterly during the first 12 months of the defect's liability period within Conservation Areas and then biannually during the second 12 months of the defect's liability period.                                                                                                                                                      | Post-construction began in February 2024. The defect liability period is the 24 month period following post- construction. Maintenance invoice by HL Landscapes and PADDOCK solutions state weed spraying and insecticide applications occurred on:<br>boom spray, chemical knockdown - 4/5/2024<br>Slash - 9/5/2024<br>Spraying - 6/5/2024<br><br>Samples of HL Landscape maintenance record reports include weed monitoring have been sighted by auditors between 25/5/2024 and 20/8/2024. In July conditions were too wet for inspection. | HL Landscapes and PADDOCK solutions invoice - 17/5/2024                                                           | Acceptable                  |
|        |                         | At the end of the of defects liability period SCA will conduct a site walkover within Conservation Area 34a with representatives from APA, DELWP and MWC for final sign off. If weed species are present within Conservation Area 34a, SCA will engage the weed contractor to conduct a final weed spray.                                                                                                                                                                                                                       | The defects liability period ends in February 2026.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                   | Not applicable              |
| 13.9.2 | Weed Monitoring Targets | During the defect liability period, SCA will aim to have less than 10% weed coverage on the ground cover which will be determined during the 12 and 24 month inspections. If more than 10% of weeds are observed during the 12 or 24 month inspection SCA will instruct the weed management contractor to target the specific weeds occurring within the rehabilitated area.                                                                                                                                                    | 12 and 24 month inspection have not yet occurred due to post-construction commencing February 2024 therefore not applicable.                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                   | Not applicable              |
|        |                         | SCA will aim to have no priority weeds listed above occurring within the rehabilitated area at the 24 month inspection. If priority weeds are present SCA will instruct the weed management contractor to conduct a final weed run and remove all priority weeds.                                                                                                                                                                                                                                                               | The defects liability period ends in February 2026.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                   | Not applicable              |
| 13.9.3 | Weed Monitoring Report  | After the weed contractor conducts weed management on behalf of SCA, the weed management contractor will provide a Weed Monitoring Report to SCA which details:<br>- Date of Monitoring<br>- Target to be achieved at 12 and 24 months and their status<br>- Any actions undertaken<br>- Any priority weeds within the conservation area<br>- Any contingencies required to be implemented for SCA to reach the 12 and 24 month targets.                                                                                        | Maintenance record reports have been provided by HL Landscaping for May, June, July and August 2024 outlining project details, works undertaken, conditions, weed spraying/insecticide application and general notes including notes of concern.<br><br>Observation<br>HL Landscapes maintenance records do not mention weed targets or contingencies required for the 12 or 24 month periods.                                                                                                                                               | HL Landscaping maintenance record reports dated:<br>27/5/2024<br>26/6/2024<br>24/7/2024<br>12/8/2024<br>20/8/2024 | Opportunity for improvement |
| 13.10  | Existing Rocks          | Any large surface rocks will be retained and where possible will be replaced back into the site. Returned rocks should be placed so that any oxidised surfaces remain exposed.                                                                                                                                                                                                                                                                                                                                                  | The auditors sighted that the rocks removed at the Merri Creek crossing were replaced as close as practical to their pre-construction position.                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                   | Acceptable                  |
| 13.11  | Site Rubbish            | SCA will remove all rubbish, including dumped and wind-blown rubbish from the rehabilitated area during reinstatement and the defect liability period.                                                                                                                                                                                                                                                                                                                                                                          | Site inspections at Merri Creek conducted by SPIECAPAG show minimal rubbish including dumped and wind-blown rubbish on site.<br><br>On the day of the audit, the auditors noted there was no dumped or wind-blown rubbish at the creek crossing area.                                                                                                                                                                                                                                                                                        | SPIECAPAG site inspections 2024                                                                                   | Acceptable                  |
| 14.0   | MONITORING              | A practical completion site inspection of Conservation Area 34a will be undertaken after rehabilitation by representatives from APA, SCA, DELWP MSA and Melbourne Water. The inspection will identify action items to be closed out for environmental protection. Examples of actions include identification of weeds requiring treatment and signs of erosion. SCA will rectify any items raised in this walkthrough in a timely manner in priority of the identified hazards which have the greatest risk to the environment. | The defects liability period ends in February 2026.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                   | Not applicable              |
|        |                         | A final site inspection will be undertaken by representatives from APA, SCA, DWELP MSA and Melbourne Water at the end of the defect liability period to sign off on Conservation Area 34a's rehabilitation requirements.                                                                                                                                                                                                                                                                                                        | The defects liability period ends in February 2026.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                   | Not applicable              |

|                                                                            |      |                                                                                                                                             |                                                                                                                                                                                                                                                                                                                   |                                          |            |
|----------------------------------------------------------------------------|------|---------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|------------|
| Appendix A                                                                 | EWMS | SCA will limit the amount of time flow diversions are required at Merri Creek by:<br>Rehabilitating Merri Creek immediately after backfill. | Site inspection conducted on 28/02/2024 confirmed Merri Creek reinstatement works (including trench backfill) were completed on 28 and 29 February 2024. Works included the removal of pumps to limit flow diversions. February 2024 therefore marks the beginning of the rehabilitation period at this location. | SPIECAPAG site inspections<br>28/2/2024. | Acceptable |
| Merri Creek Rock Placement and Installation Notes (Site Description Paper) |      |                                                                                                                                             |                                                                                                                                                                                                                                                                                                                   |                                          |            |

The Merri Creek rock placement and installation notes conditions have been met through compliance with all previously mentioned conditions in the SSEMP.

|                             | Percentage Total |
|-----------------------------|------------------|
| Acceptable                  | 42               |
| Major non-conformance       | 0                |
| Minor non-conformance       | 0                |
| Observation                 | 6                |
| Opportunity for improvement | 3                |
| Not applicable              | 11               |
| Total                       | 62               |



PRELIMINARY DRAFT WORM Commitments Register (based on Deep Creek SSEMP Rev1, dated 15/11/22)

KP 16.8 – HDD at Deep Creek (east side, off Wildwood Road)

| Document Section | Title                                             | Extract                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Aventus findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Document reference                                                                                                                                                                                       | Compliant?  |
|------------------|---------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| 6                | Melbourne Water Corporation Crossing Conditions   | Any disturbance to areas along a declared waterway reserve or private property must be kept to a minimum and reinstated as near as practicable to its former condition. Reinstatement will include but not limited to the following:<br>- Backfill, levelling and compaction;<br>- Clean-up of site;<br>- Re-grading any access tracks;<br>- Top soiling and seeding of grassed areas (only if disturbed)                                                                            | Site inspection conducted by SPIECAPAG on 4/08/2023 sited that fencing and signage in place, Konagaderra bog mats, fencing and signage also in place.<br><br>Audit inspection on 22/10/2024 confirms revegetation has occurred with the access track seeing progressive revegetation. Observed vegetation coverage above 70% with confirmation from the APA Environmental Advisor that the site has been signed off by property owner.                                                                                                                                                                                                                                                                                                                                                           | SPIECAPAG site inspection 4/8/2023                                                                                                                                                                       | Acceptable  |
| 10               | SEDIMENT AND EROSION CONTROL                      | SCA's Sodic and Dispersive Soils Management Plan has identified all subsoils along the Project alignment as highly dispersive. All subsoils excavated during works will be ameliorated with Gypsum prior to reinstatement and trench backfill at an application rate of 10kg/m3.                                                                                                                                                                                                     | The rehabilitation line list supplied by SPIECAPAG outlined that gypsum is to be applied at a rate of 2 T/Ha ( >10x greater than the commitment) however, no evidence to confirm gypsum was applied at this rate was sighted.<br><br><b>Observation</b><br>The amelioration report supplied by SPIECAPAG, completed on 28 May 2023 showed no sampling occurred at KP16.8.                                                                                                                                                                                                                                                                                                                                                                                                                        | Rehabilitation line list<br><br>Amelioration report supplied by SPIECAPAG, completed Environmental Soil Solutions Australia Pty Ltd (ESSA) - 28 May 2023 and samples analysed by ALS laboratory services | Observation |
| 11.1             | Flood Warning and Evacuation Management Procedure | Minimise the area of exposed soils with progressive reinstatement.                                                                                                                                                                                                                                                                                                                                                                                                                   | As per first row.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | SPIECAPAG site inspection 4/8/2023                                                                                                                                                                       | Acceptable  |
| 13               | PLANTING / REMEDIATION MANAGEMENT MEASURES        | The HDD construction methodology has resulted in greatly reducing the need for remediation of Deep Creek riparian vegetation clearing and bank disturbance has been avoided.<br><br>Stabilisation of the HDD entry and exit pads will be prioritised to limit the risk of sediment laden runoff reaching the watercourse after intense rainfall events.<br><br>HDD entry / exit pads will aim to be stabilised with 70% ground cover within 3 months of finishing works in the area. | Site inspection conducted on 23/04/2024 by SPIECAPAG determined the rehabilitation of former Deep Creek HDD Laydown and operations yard is completed. The inspection report stated rock (gravel/cobbles) generated through works (including separated by MISU) stockpiled on eastern edge of easement. Material requested to be left by the Landowner (Murch). Former stockpile of topsoil, approximately 35m south of work area, pulled into rehabilitation works (at the request of the landowner).<br><br><b>Observation</b><br>However, evidence to confirm stabilisation and ground coverage above 70% within 3 months has not been sighted.<br><br>In light of this, auditors sighted the former HDD site on the day of the audit, the site was stable with vegetation coverage above 70%. | SPIECAPAG site inspection 23/4/2024                                                                                                                                                                      | Acceptable  |
| 13.1             | Topsoils                                          | Topsoils stripped as part of the HDD works will have agricultural lime applied at a rate of 5kg/m3. Ag Lime will either be applied prior to topsoil stripping or applied to topsoil stockpiles and mixed with an excavator during respreading.                                                                                                                                                                                                                                       | Rehabilitation line list supplied by SPIECAPAG outlines the the addition of 5kg/m3 of agricultural lime to the topsoil.<br><br><b>Observation</b><br>The amelioration report does not indicate that lime was applied at the Deep Creek location.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Rehabilitation line list<br><br>Amelioration report supplied by SPIECAPAG, completed Environmental Soil Solutions Australia Pty Ltd (ESSA) - 28 May 2023 and samples analysed by ALS laboratory services | Observation |

|      |                        |                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                             |                                    |             |
|------|------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|-------------|
| 13.2 | Fertiliser             | Fertiliser will be applied at a rate of 100kg/Ha with a N/P/K ratio within the following ranges:<br>-Nitrogen: 7-22<br>-Potassium: 1-6<br>-Phosphorus: 2-10 | Rehabilitation line list has been provided by SPIECAPAG outlining fertiliser application rates of 100kg/H with a N/P/K ratio within:<br>Nitrogen: 7-22<br>Potassium: 1-6<br>Phosphorus: 2-10<br><br><b>Observation</b><br>The auditors have not sighted documentation to verify fertiliser application at the above listed nutrient ratios. | Rehabilitation line list           | Observation |
| 13.3 | Seeding                | A suitable pasture seed mix will be applied at a rate 30kg/Ha to the RoW for remediation.                                                                   | The rehabilitation line list provided by SPIECAPAG outlines seed mix was to be applied in line with the site SSEMP.<br><br><b>Observation</b><br>The auditors have not sighted documentation to verify that 30kg/Ha of seed mix was applied to the area.                                                                                    | Rehabilitation line list           | Observation |
| 15   | PERFORMANCE INDICATORS | Minimise the area of exposed soils with progressive reinstatement.                                                                                          | As per first row.                                                                                                                                                                                                                                                                                                                           | SPIECAPAG site inspection 4/8/2023 | Acceptable  |

|                             |          |     |
|-----------------------------|----------|-----|
| Acceptable                  | 4        | 50% |
| Major non-conformance       | 0        | 0%  |
| Minor non-conformance       | 0        | 0%  |
| Observation                 | 4        | 50% |
| Opportunity for improvement | 0        | 0%  |
| Not applicable              | 0        | 0%  |
| <b>Total</b>                | <b>8</b> |     |



PRELIMINARY DRAFT Site Specific Environment Management Plan – Conservation Area 28B (based on Rev 0, dated 3/11/22)

KP 48, 49 & 49.5 - Conservation Area 28B

| Document Section    | Title                      | Extract                                                                                                                                                                                                                                                                                                                                                                      | Aventus comments/findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Document Reference                                                                                                     | Compliant?  |
|---------------------|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|-------------|
| Compliance Measures |                            |                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                        |             |
| 1.2.1               | Approvals                  | Prior to the commencement of works a rehabilitation plan must be endorsed by DELWP showing all disturbed areas within the conservation areas to be rehabilitated. The rehabilitation plan must include:<br>a. Provision for on-going weed management until effective cover has been established.                                                                             | Site Specific Environment Management Plan – Conservation Area 28B is in place (18035-PL-HSE-0031), Rev 0 dated 3/11/22 outlined acceptance will be based on attachments provided with submission 2 of the SSEMP. No formal letter of endorsement from DELWP has been sighted.                                                                                                                                                                                                                          | Site Specific Environment Management Plan – Conservation Area 28B is in place (18035-PL-HSE-0031), Rev 0 dated 3/11/22 | Observation |
| 1.2.2               | Compliance Measures        | Prepare a Management Plan for Conservation Area 28b which includes a Rehabilitation Plan                                                                                                                                                                                                                                                                                     | Section 8 of the Site Specific Environment Management Plan – Conservation Area 28B is in place (18035-PL-HSE-0031), Rev 0 dated 3/11/22.                                                                                                                                                                                                                                                                                                                                                               | Conservation Area 28B (18035-PL-HSE-0031), Rev 0 dated 3/11/22.                                                        | Acceptable  |
|                     |                            | The rehabilitation plan is to be verified by a qualified and experienced bushland restoration land management contractor.                                                                                                                                                                                                                                                    | Appendix C of the Rehabilitation Plan provides the verification by Lucas Piperides, a qualified and experienced bushland restoration land management contractor.<br><br>The achievements & certificates of Lucas Piperides include:<br>- Bachelor of Built Environment (Landscape Architecture)<br>- Bachelor of Construction Management<br>- Certificate II and III in Landscape Construction<br>- Diploma in Horticulture<br>- Certificate IV in OH & S<br>- Site Supervisor BSA License No: 1236547 | Site Specific Environment Management Plan – Conservation Area 28B is in place (18035-PL-HSE-0031), Rev 0 dated 3/11/22 | Acceptable  |
|                     |                            | Revegetation with native vegetation is to be undertaken in accordance with the Rehabilitation Plan.                                                                                                                                                                                                                                                                          | Site inspection by Spiecapag on 19/07/2024 confirm seed mix had been applied as per specifications of the SSEMP.                                                                                                                                                                                                                                                                                                                                                                                       | SPIECAPAG site inspection 19/7/2024                                                                                    | Acceptable  |
|                     |                            | The Rehabilitation Plan is to include any specific monitoring requirements and contingency measures for addressing potential rehabilitation issues such as weed invasion and sodic and dispersive soils, as they arise.                                                                                                                                                      | This Conservation Area 28B SSEMP contains monitoring requirements and contingency measures for addressing potential rehabilitation issues such as weed invasion and sodic and dispersive soils.                                                                                                                                                                                                                                                                                                        |                                                                                                                        | Acceptable  |
|                     |                            | Where natural regeneration of species in situ is not feasible, revegetate the area using seed or nursery stock obtained from within the local area, to support preservation of native vegetation values within the broader area.                                                                                                                                             | Rehabilitation of conservation area 28B was sighted by auditors confirming areas have been reinstated to pre-construction contours, topography and appropriate vegetation in accordance with the SSEMP.                                                                                                                                                                                                                                                                                                |                                                                                                                        | Acceptable  |
|                     |                            | Prepare a Site Rehabilitation Plan for revegetation of native vegetation within the construction area.                                                                                                                                                                                                                                                                       | Section 8.0 of the SSEMP addresses rehabilitation of native vegetation.                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                        | Acceptable  |
|                     |                            |                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                        |             |
| 4                   | CONSERVATION AREA 28B      | SCA will reduce the construction impact as far as reasonably practicable within Conservation Area 28b by:<br><br>Implementing the Reinstatement and Rehabilitation Plan                                                                                                                                                                                                      | Rehabilitation of conservation area 28B was sighted by auditors confirming areas have been reinstated to pre-construction contours, topography and appropriate vegetation in accordance with the SSEMP.                                                                                                                                                                                                                                                                                                |                                                                                                                        | Acceptable  |
|                     |                            | Control the dispersal and growth of weed species within Conservation Area 28b during and post-construction.                                                                                                                                                                                                                                                                  | The monthly inspection undertaken in September (04/09/2024) by SPIECAPAG displayed revegetation coverage above 70% with weed coverage similar or less than the surrounding area. Auditors sighted minimal weeds along the easement in this section. Visually, rehabilitation appears to have been undertaken in line with Section 8.7 of the SSEMP.                                                                                                                                                    | SPIECAPAG site inspection 4/9/2024                                                                                     | Acceptable  |
| 5.3                 | Sodic and dispersive soils | SCA will conduct spoil amelioration for trench backfill in accordance with the Sodic and Dispersive Soils Management Plan (18035-PL-CN-0011) and ameliorate subgrade (subgrade is the soil horizon beneath topsoil) and topsoil in accordance with the soil amelioration rates identified in Property Management Plans (PMP for Property 1 LP38239 and Property 1 TP709759). | Spiecapag inspections conducted on 18/7/2024 and 4/9/2024 showed soil amelioration taking place at Conservation Area 28B.                                                                                                                                                                                                                                                                                                                                                                              | SPIECAPAG site inspections 18/7/2024, 4/9/2024                                                                         | Acceptable  |

|                                       |                     |                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                      |                             |
|---------------------------------------|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
|                                       |                     | Soil amelioration will also be monitored through chemical soil analysis (soil amelioration analysis). Soil amelioration analysis will be undertaken in a linear progression along the construction RoW to verify the soil has been ameliorated with the correct quantity of required ameliorant. Soil ameliorant analysis will be conducted per the Sodic and Dispersive Soils Management Plan. | Spiecapag inspections conducted on 18/7/2024 and 4/9/2024 displayed soil amelioration taking place at Conservation Area 28B.                                                                                                                                                                                                                                                                                                                                                                                    | SPIECAPAG site inspections 18/7/2024, 4/9/2024                                                                                                       | Acceptable                  |
| 6.1                                   | Weed Management     | Any weed species identified growing in topsoil stockpiles within Conservation Areas or at Conservation Area washdown bays will be immediately removed, by hand if possible, and legally disposed of. Any weeds identified in Conservations Areas will be added to the Environmental Line List to prompt maintenance during reinstatement and rehabilitation.                                    | The monthly inspection undertaken in September (04/09/2024) by SPIECAPAG displayed revegetation coverage above 70% with weed coverage similar or less than the surrounding area. Auditors sighted minimal weed across in the surrounding area.                                                                                                                                                                                                                                                                  | SPIECAPAG site inspection 4/9/2024                                                                                                                   | Acceptable                  |
| REINSTATEMENT AND REHABILITATION PLAN |                     |                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                      |                             |
| 8.1                                   | Reinstatement       | Reinstatement of the construction footprint will occur as soon as reasonably practicable after construction by reinstating the Conservation's Area existing contours to pre-construction conditions as far as reasonably practicable.                                                                                                                                                           | The APA Environmental Advisor confirmed post-construction commenced for the pipeline in February 2024. Site inspections of Conservation Area 28B (conducted on 18/7/2024 and 4/9/2024) show reinstatement of the construction area and confirming seeding took place on 21/6/2024. Based on post-construction commencement and site inspections, reinstatement of Conservation Area 28B took roughly 4 months to complete.<br><br><b>Observation</b><br>'as soon as reasonably practicable' is not defined.     | SPIECAPAG site inspections 18/7/2024 and 4/9/2024                                                                                                    | Opportunity for improvement |
| 8.2                                   | Rehabilitation Plan | SCA will rehabilitate the Conservation Area to its pre-construction condition. The Conservation Area will be rehabilitated with suitable pasture grass, with weed monitoring during SCA's 24-month defect liability period post-construction, to return the area to its original condition as an agricultural grassland.                                                                        | Inspections undertaken by SPIECAPAG display construction site revegetation growth between 18/07/2024 and 4/09/2024 in accordance with the SSEMP.<br><br>Inspection records determine both inspection sites comply with the requirements of the SSEMP with weed coverage similar or less than the surrounding area. Weed monitoring is monitored in accordance with the SSEMP. Photographic evidence included in inspection reports show the improvement in vegetation growth throughout the construction areas. | SPIECAPAG site inspections between 18/7/2024 and 4/9/2024.                                                                                           | Acceptable                  |
|                                       |                     | SCA will implement the following rehabilitation procedure as soon as practicable post-construction:<br>1. Apply gypsum to subgrade (if not already applied) at a rate of 2 ton / Ha.                                                                                                                                                                                                            | Auditors sighted an amelioration report from Environmental Soil Solutions Australia Pty Ltd (ESSA) (28 May 2023) confirming gypsum has been added to subgrade soils at 20kg/m2.                                                                                                                                                                                                                                                                                                                                 | Amelioration report supplied by SPIECAPAG, completed Environmental Soil Solutions Australia Pty Ltd (ESSA) - 28 May 2023 and samples analysed by ALS | Acceptable                  |
|                                       |                     | 2. Rip subgrade compacted by construction activities within Conservation Area.                                                                                                                                                                                                                                                                                                                  | The monthly inspection conducted by SPIECAPAG on 18/07/2024 includes photographic evidence of ripping of the soil where construction has occurred.                                                                                                                                                                                                                                                                                                                                                              | SPIECAPAG site inspection 18/7/2024                                                                                                                  | Acceptable                  |
|                                       |                     | 3. Respread topsoil stripped from the area with 2 ton / Ha of agricultural lime mixed into the topsoil.                                                                                                                                                                                                                                                                                         | The SPIECAPAG rehabilitation line list outlined the application locations of lime at a rate of 2 tonnes / ha to topsoil along the pipeline inline with relevant SSEMP's.<br>On the day of the audit, auditors sighted no areas of bare soils where seeds and fertiliser was applied. Small areas of bare soil were noted due to livestock grazing.                                                                                                                                                              | Rehabilitation line list                                                                                                                             | Acceptable                  |
|                                       |                     | 4. Conduct an initial weed knock down spray on the topsoil prior to seeding.                                                                                                                                                                                                                                                                                                                    | Weed invoices supplied by SPIECAPAG confirm weed control has occurred along the pipeline between 28/3/2024 and 23/6/2024. The monthly inspection undertaken in September (04/09/2024) by SPIECAPAG displayed revegetation coverage above 70% with weed coverage similar or less than the surrounding area. Auditors sighted very few weeds in Conservation Area 28B.                                                                                                                                            | SPIECAPAG weed invoices<br><br>SPIECAPAG site inspection 4/9/2024                                                                                    | Acceptable                  |
|                                       |                     | 5. Spread suitable pasture grass seed mix on topsoil and apply suitable fertiliser to topsoil.                                                                                                                                                                                                                                                                                                  | Site inspection conducted on 4/09/2024 confirms ground cover reaching 70%.<br>Auditors noted a high cover of pasture grass on the easement in Conservation Area 28B.                                                                                                                                                                                                                                                                                                                                            | SPIECAPAG site inspection 4/9/2024                                                                                                                   | Acceptable                  |

|     |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                     |                                                                          |                              |
|-----|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|------------------------------|
|     |                      | 6. Water seeded topsoil.                                                                                                                                                                                                                                                                                                                                                                                                                                | The APA environmental advisor confirmed no watering had taken place due to there being more than adequate rainfall for seed growth during the early stages of the rehabilitation phase.<br><br><b>Observation</b><br>Site inspection prompts do not include watering of topsoil                                                                                                     |                                                                          | Observation                  |
|     |                      | 7. Commence weed monitoring immediately following planting of seeds and maintain weed management throughout defect liability period.                                                                                                                                                                                                                                                                                                                    | Weed invoices supplied by SPIECAPAG confirm weed control has occurred along the pipeline between 28/3/2024 and 23/6/2024. The monthly inspection undertaken in September (04/09/2024) by SPIECAPAG indicates revegetation coverage above 70% with weed coverage similar or less than the surrounding area. Auditors sighted minimal weeds in the easement in Conservation Area 28B. | SPIECAPAG weed invoices<br><br>SPIECAPAG site inspection 4/9/2024        | Acceptable                   |
| 8.3 | Revegetation Targets | <u>1. Germination Targets</u><br>An inspection will be undertaken 4 weeks after seeding to identify if any bare patches of topsoil exist within Conservation Area 28b where seed has failed to germinate. If bare patches exist, SCA will resow the bare patches with the seed mix within 2 weeks of the inspection or as the prevailing weather conditions allow. Watering of these areas will occur in accordance with section 8.6                    | The site inspection on 4/09/2024 noted some areas may require further seeding.<br><br>Auditors sighted a very high cover of vegetation cover (above 70%) and lush pasture growth in Conservation Area 28B.                                                                                                                                                                          | SPIECAPAG site inspection 4/9/2024                                       | Acceptable                   |
|     |                      | <u>2. Grass Ground Cover Targets</u><br>SCA commit to aiming to achieve 70% grass ground cover at 12 months and 75% ground cover at 24 months during the defect liability period.                                                                                                                                                                                                                                                                       | A site inspection conducted on 4/09/2024 by SPIECAPAG confirms ground coverage is above 70%, with monitoring to continue for the 24-month period.                                                                                                                                                                                                                                   | SPIECAPAG site inspection 4/9/2024                                       | Acceptable                   |
|     |                      | SCA will conduct an inspection of the rehabilitated area 12 months and 24 months during the rehabilitation period. Using a visual assessment of groundcover (Agriculture Victoria) as the monitoring tool, SCA will record the percentage of ground cover within the rehabilitated area.                                                                                                                                                                | The 12 month inspection is February 2025 and 24 month in February 2026 and is yet to be completed at the time of the audit, therefore not applicable.                                                                                                                                                                                                                               |                                                                          | Not applicable               |
|     |                      | If the ground cover does not meet the % ground cover at the 12 month or 24 month inspection, SCA will reseed areas not meeting target ground cover and follow the Reinstatement and Rehabilitation Plans for watering and weeding.                                                                                                                                                                                                                      | As above.                                                                                                                                                                                                                                                                                                                                                                           |                                                                          | Not applicable               |
|     |                      | If SCA do not meet revegetation targets after reseeding an agronomist will be engaged to plan and implement rehabilitation.                                                                                                                                                                                                                                                                                                                             | As above.                                                                                                                                                                                                                                                                                                                                                                           |                                                                          | Not applicable               |
|     |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                     |                                                                          |                              |
| 8.4 | Seed Mix             | A seed mix containing perennial rye and fescue has been chosen to suit the climatic conditions of Conservation Area 28b and the expected time of sowing. The seed mix which will be used at Conservation Area 28b is described below with rates for drill seeding and broadcasting. Note, seed mix has been chosen in consultation with an Agronomist from DLF Seeds.<br>Kingsgate Perennial Ryegrass<br>Drill rate: 10kg/ha<br>Broadcast rate: 12kg/ha | Seeding mix was applied by Paddock Solutions on 21/6/2024. An email from Charles Grech to Will Exon confirmed mixtures were mixed manually as they were batched into the machines, in accordance with the SSMP.                                                                                                                                                                     | Email confirmation on 05/08/2023                                         | Acceptable                   |
|     |                      | Temora Winter Active Fescue<br>Drill rate: 15kg/ha<br>Broadcast rate: 18kg/ha                                                                                                                                                                                                                                                                                                                                                                           | An email from Charles Grech to Will Exon (05/08/2024) confirmed that the rates were 3 bags of "Temora" to every 2 bags of "Kingsgate" to make the correct ratio as sown (27kg/ha Temora: 18kg Kingsgate).                                                                                                                                                                           | Email confirmation on 05/08/2024<br><br>Email confirmation on 05/08/2024 | Acceptable<br><br>Acceptable |
|     |                      | Total Sowing Rate<br>Drill rate: 25kg/ha<br>Broadcast rate: 45kg/ha                                                                                                                                                                                                                                                                                                                                                                                     | An email from Charles Grech to Will Exon (05/08/2024) confirmed that Area 28B was sown via broadcast and rolled into the scarified seedbed with a pasture roller.                                                                                                                                                                                                                   | Email confirmation on 05/08/2024                                         | Acceptable                   |
|     |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                     |                                                                          |                              |
| 8.5 | Fertiliser           | SCA will use a suitable fertiliser to encourage plant growth in the Conservation Area. Generally, the fertiliser will have the following ranges: Nitrogen : 7-22<br>Phosphorus : 1-6<br>Potassium ranges: 2-10                                                                                                                                                                                                                                          | The SCA Rehabilitation line list confirms that fertiliser was applied at a rate of 100kg/Ha.                                                                                                                                                                                                                                                                                        | SPIECAPAG rehabilitation line list                                       | Acceptable                   |

|       |                                |                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                             |                |
|-------|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|----------------|
| 8.6   | Watering Topsoil with Seed Mix | SCA will water the entire Conservation Area being rehabilitated within 1 week of applying the seed mix to stimulate germination.                                                                                                                                                                                                                                             | <p>SPIECAPAG site inspection conducted on 4/09/2024 confirmed that seeding of Conservation Area 28B was completed on 21/6/2024. The APA Environmental Advisor confirmed watering was only required if rainfall was insufficient and outlined there was sufficient rainfall at the time of seed mix application.</p> <p>The 18/07/2024 site inspection (4 weeks after seeding) stated that it was unsafe for the watercart to access the easement due to excessive water on RoW, 18/7/2024 inspection displays images of poor access to RoW.</p> <p>Auditors did not sight evidence to support watering occurred within 1 week of planting at Conservation Area 28b. The auditors reviewed rainfall records at the nearest location on the BOM website, there was light rainfall before seeding and significant rainfall in the weeks following.</p> | <p>SPIECAPAG site inspection on 18/7/2024 and 04/09/2024</p> <p>BOM climate website</p>                     | Not applicable |
|       |                                | Following germination, SCA will monitor the weather forecast and if inadequate rainfall falls (<5mm per month), SCA will consider watering the Conservation Area with potable water to assist plant growth.                                                                                                                                                                  | Auditors have not sighted evidence of weather forecast monitoring or watering of tubestock.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                             | Observation    |
| 8.7   | Weed Monitoring                | SCA will engage a weed spraying contractor to undertake regular weed maintenance spraying within Conservation Areas.                                                                                                                                                                                                                                                         | <p>HL Landscapes is contracted to undergo regular weed spraying and maintenance as required.</p> <p>CA28B audit excel sheet provided by SPIECAPAG on 8/10/2024 outlined that weed spraying status is ongoing.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>HL Landscaping maintenance records</p> <p>CA28B audit excel sheet provided by SPIECAPAG on 8/10/2024</p> | Acceptable     |
|       |                                | The weed spraying contractor will ultimately determine the timing of the weed sprays to coincide with the best conditions for weed spraying. Generally, SCA will commit to weed spraying quarterly during the defect's liability period within Conservation Areas unless more frequent weed management is recommended by the weed management contractor.                     | <p>Post-construction began in February 2024. The defect liability period is the 24 month period following post-construction. Maintenance invoice by HL Landscapes and PADDOCK solutions state weed spraying and insecticide applications occurred on: boom spray, chemical knockdown - 4/5/2024<br/>Slash - 5/5/2024<br/>Spraying - 6/5/2024</p> <p>Samples of HL Landscape maintenance record reports include weed monitoring have been sighted by auditors between 25/5/2024 and 20/8/2024. In July conditions were too wet for inspection.</p>                                                                                                                                                                                                                                                                                                   | HL Landscapes and PADDOCK solutions invoice - 17/5/2024                                                     | Acceptable     |
|       |                                | At the end of the defects liability period SCA will conduct a site walkover within Conservation Area 28b with representatives from APA and DELWP for final sign off. If weed species are present within the Conservation Area SCA will engage the weed contractor to conduct a final weed spray.                                                                             | The defects liability period will conclude in February 2026.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                             | Not applicable |
| 8.7.2 | Weed Monitoring Targets        | During the defect liability period, SCA will aim to have less than 10% weed coverage on the ground cover which will be determined during the 12 and 24 month inspections. If more than 10% of weeds are observed during the 12 or 24 month inspection SCA will instruct the weed management contractor to target the specific weeds occurring within the rehabilitated area. | <p>The 12 month inspection is February 2025 and is yet to be completed at the time of the audit, therefore not applicable.</p> <p>Auditors sighted minimal weed coverage surrounding Conservation Area 28B. No weed coverage within conservation area 28B at the time of the audit.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                             | Not applicable |
|       |                                | SCA will aim to have no priority weeds listed in Section 8.7.1 occurring within the rehabilitated area at the 24 month inspection. If priority weeds are present SCA will instruct the weed management contractor to conduct a final weed run and remove all priority weeds.                                                                                                 | <p>The 24 month period is set to conclude in February 2026 therefore not applicable.</p> <p>Auditors sighted minimal weed coverage surrounding Conservation Area 28B. No weed coverage within conservation area 28B. Have been informed by the CA28B audit excel sheet provided on 8/10/2024 that the weed spray timing status is ongoing.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | CA28B audit excel sheet provided on 8/10/2024                                                               | Not applicable |

|       |                        |                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                   |                             |
|-------|------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------|
| 8.7.3 | Weed Monitoring Report | After the weed contractor conducts weed management on behalf of SCA, the weed management contractor will provide a Weed Monitoring Report to SCA which details:<br>- Date of Monitoring<br>- Target to be achieved at 12 and 24 months and their status<br>- Any actions undertaken<br>- Any priority weeds within the conservation area<br>- Any contingencies required to be implemented for SCA to reach the 12 and 24 month targets. | Maintenance record reports have been provided by HL Landscaping for May, June, July and August 2024 outlining project details, works undertaken, conditions, weed spraying/insecticide application and general notes including notes of concern.<br><br>HL Landscapes maintenance records do not mention weed targets or contingencies required for the 12 or 24 month periods.                          | HL Landscaping maintenance record reports dated:<br>27/5/2024<br>26/6/2024<br>24/7/2024<br>12/8/2024<br>20/8/2024 | Acceptable                  |
| 8.8   | Existing Rocks         | Any large surface rocks will be retained and where possible will be replaced back into the site. Returned rocks should be placed so that any oxidised surfaces remain exposed.                                                                                                                                                                                                                                                           | During the construction audit, auditors did not sight any rocks within the conservation area to be retained.                                                                                                                                                                                                                                                                                             |                                                                                                                   | Not applicable              |
| 8.9   | Site Rubbish           | SCA will remove all rubbish, including dumped and wind-blown rubbish from the rehabilitated area during reinstatement and the defect liability period.                                                                                                                                                                                                                                                                                   | Images included in the site inspections dated 18/07/2024 and 4/09/2024 display no dumped or wind-blown rubbish on the rehabilitated areas.<br>Auditors sighted no wind-blown rubbish from the rehabilitation site.                                                                                                                                                                                       | SPIECAPAG site inspections 18/7/2024 and 4/9/2024                                                                 | Acceptable                  |
| 9     | Monitoring             | Post-construction, APA and SCA will conduct a site walkthrough within Conservation Area 28b and identify action items to be closed out for environmental protection                                                                                                                                                                                                                                                                      | Evidence of a post-construction walkthrough conducted by SPIECAPAG and APA was not supplied to the auditors however various site inspections undertaken by SPIECAPAG throughout 2024 include action items to close out<br><br><b>OFI</b><br>Evidence of a post-construction specific inspection outlining and identifying action items where required could determine the compliance of this commitment. |                                                                                                                   | Opportunity for improvement |
|       |                        | SCA will rectify any items raised in this walkthrough in a timely manner in priority of the identified hazards which have the greatest risk to the environment.                                                                                                                                                                                                                                                                          | As above.                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                   | Opportunity for improvement |

|                             |           |
|-----------------------------|-----------|
| <b>Percentage Total</b>     |           |
| Acceptable                  | 25 66%    |
| Major non-conformance       | 0 0%      |
| Minor non-conformance       | 0 0%      |
| Observation                 | 2 5%      |
| Opportunity for improvement | 3 8%      |
| Not applicable              | 8 21%     |
| <b>Total</b>                | <b>38</b> |



## PRELIMINARY DRAFT WORM COMMITMENTS REGISTER (Site Rehabilitation Plan – Property 1/PS733045 RevB dated: 15/07/24 ) - KP 22.6 to 22.8

| Document Section | Title                                 | Extract                                                                                                                                                                                                                                                                                       | Aventus findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Document reference                                                                | Compliant?  |
|------------------|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------|
| 5                | Reinstatement and rehabilitation plan | Reinstatement (subgrade ripping, regrading profile to existing contours and resspreading topsoil) of native vegetation habitat within Property 1/PS733045 is expected to occur in February 2023. Rehabilitation (weed management, seeding, watering) will occur between March and April 2023. | Auditors sighted rehabilitation across the property however, surrounding area is pasture. Auditors confirmed at Property 1 PS733045 native grass was not seeded due to the fact that the property is used for pasture grazing and there had been no native grassland there prior to construction (a possible error with reporting during the ecological surveys). Rehabilitation of topsoil showed ground cover above 70%. Ripping was evident in soil contours.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                   | Acceptable  |
| 5.1              | Sodic and dispersive soils            | SCA will manage soils within Property 1/PS733045 in accordance with SCA's Sodic and Dispersive Soils Management Plan. SCA will conduct spoil amelioration on subgrade and topsoils to enhance vegetation growth during rehabilitation.                                                        | The Soil amelioration report supplied by Environmental Soil Solutions and ALS Laboratory (28 May 2023) does not include spoil amelioration at Property 1 PS733045                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Environmental Soil Solutions and ALS Laboratory amelioration report (28 May 2023) | Observation |
| 5.2              | Seed Mix                              | The seed mix selected for the rehabilitation of the Plains Grassy Woodland ground layer on Property 1/PS733045 will be a mix of available ground covers commonly found within Plains Grassy Woodland habitat.                                                                                 | <p>The APA environmental advisor stated that the property is used for grazing, therefore native grasses were not used in rehabilitation of this property. The property was planted with pasture grasses as requested by the landowner.</p> <p><b>Observation</b><br/>An ecological report (PS206074-ECO-LTR-001 Rev A) confirmed on 10/8/2023 that low native vegetation cover in this area is below the required thresholds to be considered a patch of native vegetation and the use of native grasses being less suitable for the area. Emails dated in May 2024 confirm discussions between SCA and APA with regards to pasture mix. The APA Environmental Advisor confirmed an internal decision between APA/SCA was made to utilise a normal agricultural pasture mix. This decision was made in consultation with the landholder who confirmed they agreed with this action.</p> <p>There is no management of change documentation linked to this commitment to note the findings of the ecology report that would remove this commitment.</p> | Ecological report (PS206074-ECO-LTR-001 RevA) sent to APA on 10/8/2023            | Observation |
|                  |                                       | SCA will use native grasses, which typically dominate the ground layer, such as Themeda triandra (Kangaroo Grass), Poa species (Tussock Grasses), Austroanthonia species (Wallaby Grasses), Austrostipa species (Spear Grasses), and Microlaena stipoides (Weeping Grass).                    | As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                   | Observation |
|                  |                                       | The seed mix will be applied to the ameliorated topsoil at a rate of 30 kg/Ha.                                                                                                                                                                                                                | <p>The rehabilitation line list provided by SPIECAPAG outlines seed mix was to be applied in line with the site SSEMP.</p> <p><b>Observation</b><br/>The auditors have not sighted documentation to verify that 30kg/Ha of seed mix was applied to the area.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Rehabilitation line list                                                          | Observation |

|       |                                |                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                        |                             |
|-------|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|-----------------------------|
|       |                                | <p>SCA will use a suitable fertiliser to encourage plant growth in the Protected Area.</p> <p>The fertiliser selected for use in the Protected Area will be suitable for native plant species chosen in consideration of the seed mix.</p>                           | <p>Rehabilitation line list indicates that fertiliser was applied at a rate of 100kg/Ha but the type of fertiliser is not specifid in the line list.</p> <p><b>Observation</b><br/>In line with earlier observations for the SSEMP, fertiliser suitable for native plants was not used.</p>                                                                                                              | Ecological report (PS206074-ECO-LTR-001 RevA) sent to APA on 10/8/2023 | Observation                 |
| 5.1   | Watering Topsoil with Seed Mix | <p>SCA will water the entire Protected Area being rehabilitated within 1 week of applying the seed mix to stimulate germination.</p>                                                                                                                                 | <p>The APA Environmental Advisor advised that this property was wet at the time of seeding and it wasn't feasible to water the area due to poor access.</p> <p><b>Observation</b><br/>No inspection records are in place to confirm that the site was wet immediately after seeding. The auditors recollect 2024 was a wet year and that it was wet during pipeline construction and rehabilitation.</p> |                                                                        | Opportunity for improvement |
|       |                                | <p>SCA will monitor the weekly rainfall for 6 weeks post seeding and if weekly rainfall is less than 10mm</p>                                                                                                                                                        | <p>The APA Environmental Advisor advised that rainfall in the area was adequate to promote seed growth.</p> <p><b>Observation</b><br/>No inspection records are in place to confirm that the site was wet immediately after seeding. The auditors recollect 2024 was a wet year and that it was wet during pipeline construction and rehabilitation.</p>                                                 |                                                                        | Opportunity for improvement |
|       |                                | <p>SCA will water native vegetation rehabilitated within Property 1/PS733045 with potable water</p>                                                                                                                                                                  | <p>As above.</p>                                                                                                                                                                                                                                                                                                                                                                                         |                                                                        | Opportunity for improvement |
|       |                                | <p>Watering will be managed to limit damage to the RoW being rehabilitated from vehicles tracking over newly rehabilitated topsoil and erosion.</p>                                                                                                                  | <p>As above.</p>                                                                                                                                                                                                                                                                                                                                                                                         |                                                                        | Opportunity for improvement |
| 5.2   | Weed Management                | <p>During reinstatement and rehabilitation, all plant and vehicles entering the Protected Area will require a weed and seed inspection to be undertaken by SCA Environment Team or delegate and be free of potential weed and seed carrying material (e.g. mud).</p> | <p>The auditors did not sight any records for plant and vehicle weed and seed inspections.</p>                                                                                                                                                                                                                                                                                                           |                                                                        | Observation                 |
|       |                                | <p>SCA will issue a WORM Weed Hygiene Record to all plant and vehicles after the weed and seed inspection. WORM Weed Hygiene Record will be maintained per SCA's CEMP.</p>                                                                                           | <p>The auditors did not sight any records for plant and vehicle weed and seed inspections.</p>                                                                                                                                                                                                                                                                                                           |                                                                        | Observation                 |
| 5.2.1 | Weed Monitoring                | <p>SCA will engage a weed spraying contractor to undertake regular weed maintenance spraying within the Protected Area.</p>                                                                                                                                          | <p>Paddock Solutions is contracted to undertake regular weed maintenance through the ongoing defect maintenance and defect period.</p>                                                                                                                                                                                                                                                                   | Paddock Solutions spraying records.                                    | Acceptable                  |
|       |                                | <p>SCA will commit to weed spraying of the Protected Area, quarterly during the first 12 months of the defect's liability period and then biannually during the second 12 months of the defects liability period.</p>                                                | <p>The auditors reviewed the Paddock Solutions records and note that no spraying has been undertaken at this site (records up to May 2024).</p> <p><b>Observation</b><br/>In line with earlier observations for the SSEMP, spraying to protect the protected area was not required as the area was not a protected area.</p>                                                                             |                                                                        | Observation                 |

|         |              |                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                     |                |
|---------|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|----------------|
|         |              | At the end of the of defects liability period SCA will conduct a site walkover of the Protected Area with representatives from APA for final sign off. If weed species are present within the Protected Area, SCA will engage a weed contractor to conduct a final weed spray prior to hand over of the area to APA operations. | The auditors were advised by the APA Environment Advisor that a site walk through will occur at the end of the 24 month defect liability period (due February 2026), and is therefore not currently auditable.                                                                                                                                                                                                                        |                                                     | Not applicable |
|         |              | Weed management will be managed to limit damage to the RoW being rehabilitated from vehicles tracking over newly rehabilitated topsoil.                                                                                                                                                                                         | On the day of the audit, auditors sighted minimal weed coverage across the easements inspected. Vehicle tracks were limited. The vehicle stopped near the entrance with sight inspection conducted on foot to limit damage.                                                                                                                                                                                                           |                                                     | Acceptable     |
| 5.2.2   | Biosecurity  | Biosecurity risks will be monitored for during reinstatement and rehabilitation through Environmental Site Inspections                                                                                                                                                                                                          | Site inspections do not mention <i>Phytophthora</i> , therefore the auditors conclude it was not detected furthermore, the APA Environmental Advisor confirmed no <i>Phytophthora</i> was sighted. Biosecurity risks were monitored in accordance with the SSEMP with no risks noted for this property in the site inspection records. On the day of the audit, the auditors sighted minimal weed coverage with no biosecurity risks. | Site inspections conducted by SPIECAPAG 2023 - 2024 | Acceptable     |
|         |              | <i>Phytophthora</i> has been identified in the Project's Risk Assessment. If <i>Phytophthora</i> is identified during reinstatement and rehabilitation the below procedure will occur.                                                                                                                                          | As above.                                                                                                                                                                                                                                                                                                                                                                                                                             | Site inspections conducted by SPIECAPAG 2023 - 2024 | Not applicable |
| 5.2.2.1 | Phytophthora | If phytophthora is identified within Property 1/PS733045, clean downs will be conducted for all plant, vehicles and personnel working within Property 1/PS733045 to remove soil from tools, plant and equipment, clothing and boots.                                                                                            | Site inspections do not mention <i>Phytophthora</i> , therefore the auditors conclude it was not detected. The APA Advisor states that <i>Phytophthora</i> was not identified along the pipeline corridor. The auditors did not sight any signs of <i>Phytophthora</i> (e.g., yellow leaves on shrubs/trees, or dead shrubs/trees).                                                                                                   | Site inspections conducted by SPIECAPAG 2023 - 2024 | Not applicable |
|         |              | Clean downs will be done with a blower and brush to remove soil and plant material (dust and grime have a low risk of spreading phytophthora). All material removed from plant, vehicles and equipment will be collected and legally disposed of.                                                                               | As <i>Phytophthora</i> was not detected, clean downs/washdowns were not required.                                                                                                                                                                                                                                                                                                                                                     |                                                     | Not applicable |
|         |              | Washdowns using water will be avoided where possible in and around areas of die back. If wet washdowns are required, soil and mud will be removed manually before water is used.                                                                                                                                                | As above.                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                     | Not applicable |
|         |              | All material removed from washdowns will be collected and legally disposed of. No runoff from washdowns will be allowed to leave the construction footprint, this requirement is especially important around areas of bushland where phytophthora dieback will be the most devastating for the surrounding ecosystem.           | As above.                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                     | Not applicable |
|         |              | Driving will be minimised through washdown areas where practicable.                                                                                                                                                                                                                                                             | As above.                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                     | Not applicable |
|         |              | Disinfectant will be applied to plant, vehicles and tools after clean downs and washdowns.                                                                                                                                                                                                                                      | As above.                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                     | Not applicable |
| 7       | Monitoring   | After SCA's defect liability period (24 months post-construction) APA and SCA will conduct a site walkthrough the Protected Area and identify action items to be closed out for environmental protection.                                                                                                                       | The auditors were advised by the APA Environment Advisor that a site walk through will occur at the end of the 24 month defect liability period (due February 2026) therefore, not currently applicable.                                                                                                                                                                                                                              |                                                     | Not applicable |

|  |  |                                                                                                                                                                 |           |  |                |
|--|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|--|----------------|
|  |  | SCA will rectify any items raised in this walkthrough in a timely manner in priority of the identified hazards which have the greatest risk to the environment. | As above. |  | Not applicable |
|--|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|--|----------------|

|                             | Percentage Total |     |
|-----------------------------|------------------|-----|
| Acceptable                  | 4                | 15% |
| Major non-conformance       | 0                | 0%  |
| Minor non-conformance       | 0                | 0%  |
| Observation                 | 8                | 31% |
| Opportunity for improvement | 4                | 15% |
| Not applicable              | 10               | 38% |
| <b>Total</b>                | <b>26</b>        |     |



## PRELIMINARY DRAFT WORM Commitments Register (based on Tree Management Plan Rev 1, dated 27/10/22)

TPZs were sighted KP 42

| Document Section                   | Title                              | Extract                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Aventus findings                                                                                                                                                                                                                                                                       | Document reference                         | Compliant?     |
|------------------------------------|------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|----------------|
| Vegetation Clearing within the RoW |                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                        |                                            |                |
| 7.2                                | Vegetation Clearing within the RoW | Hollow trunks and limbs will either be retained on the RoW and respread during site rehabilitation where agreed with landholders for fauna habitat, or carefully placed outside the RoW subject to landowner agreement as a management measure to minimise fauna entering the construction work area.                                                                                                                                                                                                                                  | Auditors sighted the reuse of hollow trunks at Merri Creek. Hollow trunks were placed along the top of banks of the creek to support local fauna habitat.                                                                                                                              |                                            | Acceptable     |
| 7.2                                |                                    | Vegetation will either be felled mechanically with a bulldozer / excavator or felled by an Arborist. Felled vegetation without hollows will be mulched onsite. Mulch will either be:<br>1. Offered to the landholder (if applicable) per the relevant Property Management Plan<br>2. Used onsite for erosion and sediment control berms, spread on topsoils / subsoils for erosion protection / stabilisation.<br>3. Stockpiled onsite for later use during rehabilitation.<br>4. Removed from site with the aim of sustainable reuse. | Auditors sighted revegetation occurred in accordance with relevant SSEMPs. The APA Environmental Advisor informed auditors that topsoil was retained throughout construction and reused for rehabilitation, minimal mulch was used with stockpiles of topsoil retained by land owners. | Tree Management Plan Rev 1, dated 27/10/22 | Acceptable     |
| 7.2                                |                                    | Stumps and root balls will be mulched in situ as far as reasonably practicable. Any remaining root balls and stumps will be removed by the clearing contractor.                                                                                                                                                                                                                                                                                                                                                                        | During the audit, auditors did not sight piles of mulch.<br><br>If mulch was to have been sighted, it would not have been possible to distinguish between stumps, root balls, branches or trees, therefore this is not auditable.                                                      |                                            | Not applicable |

### Percentage Total

|                             |          |     |
|-----------------------------|----------|-----|
| Acceptable                  | 2        | 67% |
| Major non-conformance       | 0        | 0%  |
| Minor non-conformance       | 0        | 0%  |
| Observation                 | 0        | 0%  |
| Opportunity for improvement | 0        | 0%  |
| Not applicable              | 1        | 33% |
| <b>Total</b>                | <b>3</b> |     |



PRELIMINARY DRAFT WORM Commitments Register (based on Minor Watercourse Crossing Procedure Rev C, dated 6/10/22)

| KP 10.5 – minor waterway crossing (unnamed tributary of Jackson's Creek) |                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                |                                                          |
|--------------------------------------------------------------------------|---------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------|
| Document Section                                                         | Title                                             | Extract                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Aventus comments/findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Document reference                                                                             | Compliant?                                               |
| 6                                                                        | MWC Crossing Conditions                           | Any disturbance to areas along a declared waterway reserve or private property must be kept to a minimum and reinstated as near as practicable to its former condition.<br>Reinstatement will include but not limited to the following:<br>- Backfill, levelling and compaction;<br>- Clean-up of site;<br>- Re-grading any access tracks;<br>- Top soiling and seeding of grassed areas (only if disturbed)                                                                                                                                                                                                                                                         | Site inspections conducted by SPIECAPAG on 13/6/2024 (the culvert constructed at MLV KP 34.8), 20/6/2024 (Tame St) and 4/9/2024 (Morefield court and Guns Gully) include images of completed reinstatement and rehabilitation.<br><br><b>Observation</b><br>Auditors have not sighted evidence of the reinstatement of minor watercourse crossings. On the day of the audit, auditors did not visit any minor watercourse crossings.                                                                       | SPIECAPAG site inspections records: 13/6/2024 20/6/2024 4/9/2024                               | Observation                                              |
|                                                                          | MWC Correspondence Table                          | With regard to the vehicle crossings access tracks for waterway crossing points as shown in Figure 1 and 2, it is Melbourne Water's understanding that these crossings are for temporary construction access and will be removed and made good as part of the reinstatement.                                                                                                                                                                                                                                                                                                                                                                                         | As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                | Observation                                              |
|                                                                          |                                                   | <b>Planting / remediation management measures.</b><br>Remediation will need to be to the satisfaction of Melbourne Water. Melbourne Water requires further information on the planting/remediation techniques for waterway crossings. E.g. seeding, landscape treatments and planting schedules/plans/quantities/species. Disturbed channels and banks need to be reseeded and planted quickly to establish robust vegetation and prevent erosion.<br>The reinstatement should include planting of suitable tube stock (i.e. juncus and sedges – please include Lomandra Longifolia) within the channels and banks to ensure suitable root structures for stability. | For context the minor watercourse crossings are:<br>KP 8.36 - Tame Street Drain<br>KP 31.5 - KP 36.2 - Kalkallo Creek tributary<br>KP 47.21 - Darebin Creek tributary<br>KP 50.8 - Curl Sedge Creek<br><br>Site inspection report conducted by SPIECAPAG on 4/9/2024 states that Guns Gully works is completed and is awaiting inspection by Melbourne Water.<br><br><b>Observation</b><br>No evidence to confirm Melbourne Water has inspected minor watercourse crossings have been sighted by auditors. | SPIECAPAG site inspection record - 4/9/2024                                                    | Observation                                              |
|                                                                          |                                                   | <b>Performance indicators</b><br>Melbourne Water considers the following management action as critical:<br>• Reinstatement watercourse crossings as soon as construction of crossing is complete to minimise duration of disturbance. Reinstatement watercourse profile back to pre-disturbance profile as far as possible.<br>• Minimise duration of open trench across watercourse crossings through installing crossing and backfilling in the shortest practicable time.                                                                                                                                                                                         | As above.<br><br>Auditors have not sighted evidence backfilling of minor watercourse crossings.<br><br><b>Observation</b><br>Various site inspections conducted by SPIECAPAG display rehabilitation of a sample of minor watercourse crossings.                                                                                                                                                                                                                                                            | SPIECAPAG site inspections records: 13/6/2024 20/6/2024 4/9/2024                               | Observation                                              |
|                                                                          |                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                |                                                          |
| 7                                                                        | Construction methodology                          | Backfilling the trench, compacting the trench, returning watercourse or drainage line to its pre-construction contours as far as possible.<br>Rehabilitating and stabilising the watercourse / drainage line as soon as construction is complete in the area.                                                                                                                                                                                                                                                                                                                                                                                                        | As above.<br>As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                | Observation<br>Observation                               |
| 7.1                                                                      | Dry work area                                     | Backfilling the trench, compacting the trench, returning watercourse or drainage line to its pre-construction contours as far as possible.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                | Observation                                              |
| 7.2                                                                      | Wet work area                                     | Backfill trench, reinstatement watercourse profile to pre-construction contours as far as possible and remediate watercourse / drainage line.<br>Remove downstream bund.<br>Remove upstream bund.<br>Remove pumps and allow water to flow over the crossing.                                                                                                                                                                                                                                                                                                                                                                                                         | As above.<br>As above.<br>As above.<br>As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                | Observation<br>Observation<br>Observation<br>Observation |
| 10.1                                                                     | Flood Warning and Evacuation Management Procedure | Minimise the area of exposed soils with progressive reinstatement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Various site inspection conducted by SPIECAPAG display progressive rehabilitation of a sample of minor watercourse crossings. Exposed soils was minimal with ground coverage above 70%.<br><br>Inspection Report from MW (20/2/2025) notes that 2 minor watercourses require reseeding, which may indicate some areas of exposed soils that haven't been successfully rehabilitated.                                                                                                                       | SPIECAPAG site inspections: 13/6/2024 20/6/2024 4/9/2024<br><br>MW inspection report 20/2/2025 | Acceptable                                               |

|    |                                            |                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                          |                |
|----|--------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|----------------|
| 9  | SEDIMENT AND EROSION CONTROL               | In general, the following ameliorants will be applied to the soils stripped and excavated from watercourse and drainage lines:<br>Gypsum applied at 2kg/ha<br>Lime applied at 1kg/ha                                                                                                                                                                                                   | For context the minor watercourse crossings are:<br>KP 8.36 - Tame Street Drain<br>KP 31.5 - KP 36.2 - Kalkallo Creek tributary<br>KP 47.21 - Darebin Creek tributary<br>KP 50.8 - Curl Sedge Creek<br><br><b>Observation</b><br>The rehabilitation line list outlines the rates where lime and gypsum are applied however, no evidence was sighted to confirm the application rates of gypsum and lime.                                                                                                                   | Rehabilitation line list<br>Soil amelioration report                     | Observation    |
|    |                                            | In areas identified as highly dispersive under the EES Technical Report D – Ground Movement and Land Stability will aim to be ameliorated with gypsum to reduce the Exchangeable Sodium Percentage (ESP) to approximately 4% or less and / or cap dispersive soils with a 300mm layer of non-dispersive soil.                                                                          | See above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                          | Observation    |
| 11 | VEGETATION MANAGEMENT TECHNIQUES           | Vegetation (e.g. riparian vegetation, ground cover, sedges and rushes) cleared as part of the construction within and adjacent to watercourses and drainage lines will be either be mulched or stockpiled for use during site rehabilitation.                                                                                                                                          | Site inspections at various minor watercourse crossings supplied by SPIECAPAG show no signs of vegetation clearance.<br><br>The APA Environmental Advisor confirmed that ground cover was scalped and reinstated with no shrubs/trees required to be removed.                                                                                                                                                                                                                                                              |                                                                          | Observation    |
| 13 | PLANTING / REMEDIATION MANAGEMENT MEASURES | Revegetation will be prioritised in and around watercourses and drainage lines. SCA will revegetate minor watercourses with ground covers similar to what is existing surrounding the watercourse pre-construction.                                                                                                                                                                    | Various site inspection conducted by SPIECAPAG display progressive rehabilitation of a sample of minor watercourse crossings. Exposed soils was minimal with ground coverage above 70%.                                                                                                                                                                                                                                                                                                                                    | SPIECAPAG site inspections records:<br>13/6/2024<br>20/6/2024            | Acceptable     |
|    |                                            | Generally, SCA will revegetate with pasture grass seed mix at an application rate of 30kg/Ha.                                                                                                                                                                                                                                                                                          | For context the minor watercourse crossings include:<br>KP 8.36 - Tame Street Drain<br>KP 31.5 - KP 36.2 - Kalkallo Creek tributary<br>KP 47.21 - Darebin Creek tributary<br>KP 50.8 - Curl Sedge Creek<br><br>Site inspection report conducted by SPIECAPAG on 4/9/2024 states natural revegetation occurred at Guns Gully.<br><br><b>Observation</b><br>The rehabilitation line list outlines the rates where pasture seed mix is applied however, no evidence was sighted to confirm the application of pasture mix.    |                                                                          | Observation    |
|    |                                            | In areas of high erosion risk (due to topography or surface water flow) identified in the SSESOP, SCA may use suitable tube stock, such as <i>Lomandra longifolia</i> planted within the watercourse channel and banks to ensure suitable root structures for stability                                                                                                                | Site inspections at various minor watercourse crossings supplied show no signs of tubestock planting with site inspection report conducted by SPIECAPAG on 4/9/2024 stating that natural revegetation occurred at Guns Gully. Auditors have sighted no evidence of tubestock planting at minor watercourse crossings.                                                                                                                                                                                                      | SPIECAPAG site inspection report - 4/9/2024                              | Not applicable |
|    |                                            | Revegetated areas will be maintained until ground cover has reached 70% coverage. The follow measures will be incorporated into the revegetation of minor watercourses and drainage lines: Monitoring for scour will occur weekly, and after rainfall events. Maintenance will be implemented if erosion is detected to enhance the stabilisation of the watercourse / drainage lines. | Various site inspection conducted by SPIECAPAG display progressive rehabilitation of a sample of minor watercourse crossings. Exposed soils was minimal with ground coverage above 70%.<br><br>Inspection Report from Melbourne Water (MW) (20/2/2025) verifies watercourses have been inspected and indicated Jackson Creek, Deep Creek, parts of Kalkallo Tributary, Merri Tributary, Curly Sedge Creek and Tame Street Drain watercourses have been reinstated to their satisfaction indicating erosion is not an issue | SPIECAPAG site inspection in 2024.<br><br>MW inspection report 20/2/2025 | Acceptable     |

|            |                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                   |             |
|------------|---------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-------------|
|            |                                                         | <p>Periodic watering will occur during periods of no rainfall to increase natural regeneration and plant strike.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>Auditors sighted land use has returned to pre-construction uses as close as reasonably practicable. Various site inspection conducted by SPIECAPAG display minor watercourse crossings containing water.</p> <p>Inspection Report from MW (20/2/2025) notes that Merri Creek, parts of Kalkallo Tributary and Darebin Creek require reseeding which indicates that natural regeneration and plant strikes has not been 100% successful.</p>                               | <p>SPIECAPAG site inspection in 2024</p> <p>MW inspection report 20/2/2025</p>                                    | Observation |
|            |                                                         | <p>Weed control will be implemented during rehabilitation per the Weed Management Plan within the CEMP.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>HL Landscaping invoice ( 17/5/24) outlines that weed management occurred at:<br/>KP 47.21 - Darebin Creek tributary<br/>KP 50.8 - Curly Sedge Creek</p> <p>Weed management occurred on:<br/>boom spray and chem knockdown - 4/5/2024<br/>spraying - 6/5/2024<br/>slashing - 5/5/2024</p> <p>The APA Environmental Advisor stated that not all minor watercourses required weed control.</p>                                                                               | <p>HL Landscaping invoice ( 17/5/24)</p>                                                                          | Acceptable  |
| 15         | Performance Indicators                                  | <p><b>Surface Water Flows</b></p> <p>Reinstate watercourse crossings as soon as construction of crossing is complete to minimise duration of disturbance. Reinstate watercourse profile back to pre-disturbance profile as far as possible.</p>                                                                                                                                                                                                                                                                                                      | <p>Site inspections conducted by SPIECAPAG on 13/6/2024 (the culvert constructed at MLV KP 34.8), 20/6/2024 (Tame St) and 4/9/2024 (Morefield court and Guns Gully) include images of completed rehabilitation.</p> <p><b>Observation</b><br/>Auditors have not sighted evidence of progressive reinstatement of minor watercourse crossings.</p>                                                                                                                            | <p>SPIECAPAG site inspections records:<br/>13/6/2024<br/>20/6/2024<br/>4/9/2024</p>                               | Observation |
|            |                                                         | <p>The SSESOP for minor watercourse crossings is to provide specific details on the methods for watercourse crossings, treatment of soils and cleared vegetation, backfill and reinstatement requirements, and contingencies for rainfall.</p>                                                                                                                                                                                                                                                                                                       | <p>Section 9.0 of the Minor Watercourse Crossing Procedure (18035-PR-CN-0008) outlines the sediment and erosion control for each watercourse outlining SSESOP details.</p>                                                                                                                                                                                                                                                                                                   | <p>Minor Watercourse Crossing Procedure (18035-PR-CN-0008) section 9</p>                                          | Acceptable  |
|            |                                                         | <p>Minimise the area of exposed soils with progressive reinstatement.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>Site inspections conducted by SPIECAPAG on 13/6/2024 (the culvert constructed at MLV KP 34.8), 20/6/2024 (Tame St) and 4/9/2024 (Morefield court and Guns Gully) include images of completed rehabilitation.</p> <p><b>Observation</b><br/>Inspection Report from MW (20/2/2025) notes that Merri Creek, parts of Kalkallo Tributary and Darebin Creek require reseeding which may indicate some areas of exposed soils that haven't been successfully rehabilitated.</p> | <p>SPIECAPAG site inspections:<br/>13/6/2024<br/>20/6/2024<br/>4/9/2024</p> <p>MW inspection report 20/2/2025</p> | Observation |
|            |                                                         | <p>Reinstate watercourse crossings as soon as construction of crossing is complete to minimise duration of disturbance. Reinstate watercourse profile back to pre-disturbance profile as far as possible.</p>                                                                                                                                                                                                                                                                                                                                        | <p>Inspection Report from MW (20/2/2025) does not indicate any concerns with re-profiling of the creeks.</p> <p>Site inspections conducted by SPIECAPAG on 13/6/2024 (the culvert constructed at MLV KP 34.8), 20/6/2024 (Tame St) and 4/9/2024 (Morefield court and Guns Gully) include images of completed rehabilitation.</p>                                                                                                                                             | <p>SPIECAPAG site inspections:<br/>13/6/2024<br/>20/6/2024<br/>4/9/2024</p> <p>MW inspection report 20/2/2025</p> | Acceptable  |
|            |                                                         | <p>SCA will following the Watercourse Crossing Procedure (this document) to prioritise the reinstatement of watercourse crossings and reprofile the watercourse crossings to their existing contours as far as possible to minimise disturbance and limit the duration of time the trench is open through the watercourses.</p>                                                                                                                                                                                                                      | <p>As above.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                   | Acceptable  |
| Appendix A | Conducting works within watercourse with low or no flow | <p>Temporary access tracks across watercourses to be capped with clean rock (to be removed after access is no longer required) or soil binder applied (e.g. Vital Bon-Matt HR) if low flow surface flow occurs that has the potential to washout access tracks. Temporary construction access tracks to be removed after access is no longer by:</p> <ul style="list-style-type: none"> <li>o Install pumps upstream of construction access tracks to bypass water around access track prior to removal. Pump bypass to occur per SSESOP.</li> </ul> | <p>As above.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                   | Acceptable  |

|  |  |                                                                                              |           |  |            |
|--|--|----------------------------------------------------------------------------------------------|-----------|--|------------|
|  |  | o Remove access track and regrade footprint to pre-construction contours as far as possible. | As above. |  | Acceptable |
|  |  | o Reinstate / stabilise access track.                                                        | As above. |  | Acceptable |
|  |  | o Remove downstream ESC.                                                                     | As above. |  | Acceptable |
|  |  | o Remove upstream pump.                                                                      | As above. |  | Acceptable |

|                             |    |      |
|-----------------------------|----|------|
| Percentage Total            |    |      |
| Acceptable                  | 12 | 38%  |
| Major non-conformance       | 0  | 0%   |
| Minor non-conformance       | 0  | 0%   |
| Observation                 | 19 | 59%  |
| Opportunity for improvement | 0  | 0%   |
| Not applicable              | 1  | 3%   |
| Total                       | 32 | 100% |



## PRELIMINARY DRAFT WORM COMMITMENTS REGISTER (WORM Primary Erosion and Sediment Control Plan, Rev B, dated 4/11/22 )

| Document Section | Title                            | Extract                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Aventus comments/findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Document reference                                 | Compliant? |
|------------------|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|------------|
| 4.2              | Erosion and Sediment Control SW3 | <b>Site Rehabilitation measures for disturbance caused by open cut trench construction</b><br>Implement site rehabilitation measures to minimise the impacts to waterway health as far as reasonably practicable and in accordance with EPA Publication 1896: <i>Manage how you work within or adjacent to waterways</i> including:<br><br>Compact soil, scarify and re-profile the land to original contours to maintain the waterway and floodplain function. | The auditors sighted rehabilitation at sites visited such as Merri Creek, Jackson Creek and Conservation Area 28B that was in accordance with relevant SSEMPs. Land contours were congruent with surrounding areas. Waterways were reinstated to pre-construction conditions with rehabilitation. Waterway and floodplain function did not appear altered from the pre-construction state.                                                                                                        |                                                    | Acceptable |
|                  |                                  | Restrict any operational works to the easement only, with landholder requirements determined prior to commencement of works.                                                                                                                                                                                                                                                                                                                                    | Areas inspected by the auditors did not indicate that unauthorised work occurred off the pipeline easement.<br><br>A review of site inspections conducted by SPIECAPAG confirms all works remained on permitted areas with images and explanations of work.                                                                                                                                                                                                                                       | Various SPIECAPAG site inspection reports in 2024. | Acceptable |
|                  |                                  | Restore waterway bed and banks as soon as reasonably practicable after pipe installation and backfilling works.                                                                                                                                                                                                                                                                                                                                                 | Site inspection conducted on 28/02/2024 confirmed Merri Creek reinstatement works (including trench backfill) were completed on 28 and 29 February 2024.                                                                                                                                                                                                                                                                                                                                          | SPIECAPAG site inspection on 28/2/2024 - 29/2/2024 | Acceptable |
|                  |                                  | Restore banks by grading (nominally 1:3 grade and revegetation), and smoothly transition to the undisturbed banks (refer to APA standard drawing no. 530-DWG-L-5008).                                                                                                                                                                                                                                                                                           | The Merri Creek banks were restored with a smooth transition to undisturbed banks. Sediment control measures were in place to avoid erosion from surrounding pastures, and the creek banks were stabilised with erosion matting (jute matt), rock check and planted with native species tubestock.                                                                                                                                                                                                |                                                    | Acceptable |
|                  |                                  | Restore waterway bed to pre-construction profile, and smoothly transition to the upstream and downstream undisturbed bed condition.                                                                                                                                                                                                                                                                                                                             | As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                    | Acceptable |
|                  |                                  | Provide temporary protection such as geofabric or erosion matting on bed and banks to prevent erosion until vegetation has established.                                                                                                                                                                                                                                                                                                                         | As above.<br><br>Biodegradable erosion matting was also sighted at Jackson creek.                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                    | Acceptable |
|                  |                                  | Carry out routine inspections (e.g. minimum every six months plus potentially following any significant flood event) to monitor effectiveness of civil rehabilitation works (earthworks and rock beaching works) during the first 24 months post-construction.                                                                                                                                                                                                  | The APA Environmental Advisor provided advice that the end of construction was considered to be February 2024.<br><br>Site inspections that were conducted between September 2023 and August 2024 were provided by APA, verifying that routine post-construction inspections were undertaken.<br><br>APA advises that inspections will be ongoing for the 24-month post-construction period (i.e., through to February 2026).                                                                     |                                                    | Acceptable |
|                  |                                  | Where monitoring identifies defects or deficiency in civil rehabilitation works, appropriate rectification measures will need to be implemented.                                                                                                                                                                                                                                                                                                                | On the day of the audit, auditors sighted no obvious defects to rehabilitated sites along the pipeline.<br><br>Various rehabilitation SPIECAPAG site inspections in 2024 show no obvious defects including:<br><ul style="list-style-type: none"><li>- Erosion</li><li>- Damaged Fencing</li><li>- Soil crowning</li><li>- Soil subsidence</li></ul><br>The APA Environmental Advisor stated that monitoring will be ongoing for the 24-month post-construction which concludes in February 2026. | Various SPIECAPAG site inspection reports in 2024. | Acceptable |

|        |                                  |                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                            |                                                    |                |
|--------|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|----------------|
|        |                                  | Establishment of vegetation cover within the first three months post-construction.                                                                                                                                        | Review of various site inspection reports indicates progressive reinstatement of the pipeline construction RoW was undertaken, noting that reinstatement occurs progressively post-construction and a strict assessment against the 3 month requirement is extremely difficult to ascertain.                                                                               | Various SPIECAPAG site inspection reports in 2024. | Acceptable     |
|        |                                  | Following establishment of vegetation/ground cover, routine maintenance to be undertaken for a period of 24 months to monitor and manage successful reinstatement                                                         | Site inspections records from SPIECAPAG confirm ongoing routine maintenance, with the latest accessible inspections being September 2024.                                                                                                                                                                                                                                  | Various SPIECAPAG site inspection reports in 2024. | Acceptable     |
|        |                                  | Include site-specific application of rock beaching protection as part of site rehabilitation where required                                                                                                               | The banks of Merri Creek included rock check to minimise erosion.                                                                                                                                                                                                                                                                                                          |                                                    | Acceptable     |
|        | LU19                             | SCA have a 24 month monitoring and management period post-construction of the pipeline. During the 24 months, SCA will:<br><br>Monitor disturbed areas for signs of erosion or trench subsidence                          | The auditors did not see evidence of erosion or trench subsidence during the audit.<br><br><b>Observation</b><br>The SPIECAPAG site inspection reports include prompts for noting whether ERSED controls are in place but no prompts for whether erosion or trench subsidence is observed. This being the case there were no notes regarding erosion or trench subsidence. | Various SPIECAPAG site inspection reports in 2024. | Acceptable     |
|        |                                  | Manage weed outbreaks                                                                                                                                                                                                     | SPIACAPAG site inspection records do not note any significant weed outbreaks.                                                                                                                                                                                                                                                                                              | Various SPIECAPAG site inspection reports in 2024. | Acceptable     |
|        |                                  | Monitor areas where ground cover is <70% coverage.                                                                                                                                                                        | The auditors observed that the pipeline easement had pasture grass coverage greater than 70%.<br><br><b>Observation</b><br>Very few of the SPIECAPAG site inspection reports make any note of ground coverage.                                                                                                                                                             |                                                    | Acceptable     |
| 5.3.13 | Rehabilitation and Reinstatement | Site Rehabilitation shall be conducted in accordance with the Project's Reinstatement and Rehabilitation Procedure within SCA's CEMP which complies with the reinstatement requirements of the Property Management Plans. | Refer to Rehabilitation and reinstatement sheet.                                                                                                                                                                                                                                                                                                                           |                                                    | Not applicable |
|        |                                  | Site specific plans will be developed for high-risk locations including major watercourse crossings and conservation areas.                                                                                               | Specific SSEMPs are in place for high-risk locations such as Merri Creek, Jackson Creek, conservation area 28B and watercourse crossings.                                                                                                                                                                                                                                  |                                                    | Acceptable     |
|        |                                  | Areas where protected species habitat exist (e.g. Golden Sun Moth, Striped Legless Lizard and Growling Grass Frog) should be reinstated and rehabilitated as soon as reasonably practicable after construction.           | Review of various site inspection reports indicates progressive reinstatement of the pipeline construction RoW was undertaken, noting that reinstatement occurs progressively post-construction. None of the site inspection reports sighted by the auditors contain any information regarding the timeliness of reinstatement of protected species habitat areas.         | Various SPIECAPAG site inspection reports in 2024. | Observation    |
|        |                                  | All material removed from a sediment control device during maintenance or decommissioning, whether solid or liquid must be disposed of in a manner that does not cause ongoing soil erosion or environmental harm.        | SPIACAPAG site inspection reports do not contain any information regarding the removal of solids or liquids from sediment control devices.<br><br><b>Observation</b><br>There is no prompt in the site inspections to record this information                                                                                                                              |                                                    | Observation    |
|        |                                  | Site spoil must be lawfully disposed of in a manner that does not result in ongoing soil erosion or environmental harm.                                                                                                   | As above.                                                                                                                                                                                                                                                                                                                                                                  |                                                    | Observation    |

|  |  |                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                          |                                                    |            |
|--|--|-------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|------------|
|  |  | Temporary ESC is to remain in place until 80% cover has been achieved by rehabilitation or permanent works. | Sediment control devices (coir logs) were in place at the emergency works area at Jacksons Creek with no evidence of accumulated sediment or other solids or liquids. Grass cover here was greater than 80% and the APA Environment Adviser stated that this ESC would not be removed because it is biodegradable. Site inspections conducted by SPIECAPAG included images of ground coverage above 80%. | Various SPIECAPAG site inspection reports in 2024. | Acceptable |
|--|--|-------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|------------|

| Percentage Total            |    |     |
|-----------------------------|----|-----|
| Acceptable                  | 16 | 80% |
| Major non-compliance        | 0  | 0%  |
| Minor non-compliance        | 0  | 0%  |
| Observation                 | 3  | 15% |
| Opportunity for improvement | 0  | 0%  |
| Not applicable              | 1  | 5%  |
| Total                       | 20 |     |



PRELIMINARY DRAFT WORM Commitments Register (based on FAUNA MANAGEMENT PLAN Rev1, dated 1/9/22)

| Document Section                        | Title                                                                                                                 | Extract                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Audit finding                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Document reference                                                                       | Compliant?                          |
|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|-------------------------------------|
| 3.2                                     | Summary of general management measures required by Project phase                                                      | <p>The rehabilitation of the construction area and temporary work areas will begin as soon as practicable after the completion of construction. Rehabilitation of the construction footprint will reinstate existing topography, infrastructure and appropriate vegetation.</p> <p>Rehabilitation of the construction corridor will be undertaken in accordance with the EMMs in the Project CEMP.</p>                                                                                                                                                                                                                                  | During the audit, auditors sighted rehabilitation of construction and temporary work areas, which confirmed that areas have been reinstated to pre-construction contours, topography and appropriate vegetation in accordance with the relevant SSEMP.                                                                                                                                                                                                                                                                                      |                                                                                          | Acceptable                          |
| 3.3.1                                   | Protocol for the removal of hollow-bearing trees and other habitat timber                                             | <p>Where hollow-bearing trees and logs cannot be avoided, the following protocols will be undertaken to minimise the impacts upon dependent fauna that may live in the hollows:</p> <p>Subject to landowner agreement, hollow branches, logs and trunks may be removed from the construction area and placed adjacent to the ROW so that they remain available as fauna habitat. Removed branches, logs and trunks will then be used to reinstate habitat at the completion of construction.</p>                                                                                                                                        | During the audit, auditors sighted hollow branches, logs and trunks that were reused to reinstate habitats where applicable. Merri Creek has logs removed for construction and auditors sighted the placement of logs along the top of the creek banks.                                                                                                                                                                                                                                                                                     |                                                                                          | Acceptable                          |
| Growling Grass Frog management measures |                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                          |                                     |
| 4.1.2                                   | <b>Pre-construction phase</b><br>Establish requirements for reinstatement of aquatic habitat                          | APA CEMP EMM SW3 - Site Rehabilitation measures for disturbance caused by open cut trench construction.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | During the audit, auditors sighted Merri Creek rehabilitation was undertaken in accordance with the rehabilitation SSEMP. The aquatic habitat was reinstated, auditors sighted rocks were laid on the creek bed and along the creek banks, with tubestock planting along the creek banks. Tubestock growth was evident at the water edge, though seedling growth had been hampered by wildlife grazing.                                                                                                                                     |                                                                                          | Acceptable                          |
|                                         | <b>Post-Construction Phase</b><br>Site Reinstatement                                                                  | APA CEMP EMM SW3 - Site Rehabilitation measures for disturbance caused by open cut trench construction                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | On the day of the audit, auditors sighted Merri Creek rehabilitation was in accordance with the sites specific SSEMP with rock placement along the banks, under the estuary, tubestock planting along the water line and bank of Merri Creek. Rocks lined the banks to prevent erosion with sediment control measures in place.                                                                                                                                                                                                             |                                                                                          | Acceptable                          |
| Golden Sun Moth Management measures     |                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                          |                                     |
| 4.2.1                                   | <b>Construction phase</b><br>Topsoil management measures for Golden Sun Moth                                          | <p>APA CEMP EMM B8 - Topsoil management includes elements relating specifically to managing impacts to grassland Golden Sun Moth habitat:</p> <p>In areas that are to be disturbed temporarily (i.e., reinstated after construction) and that require topsoil stripping, the period between pre-trenching topsoil stripping and post-trenching topsoil replacement must be minimised to the extent practicable.</p> <p>Appropriate measures to strip, separate (from sub-soils) and reinstate topsoils in the construction corridor must be undertaken. As far as reasonably practicable, topsoil will be progressively reinstated.</p> | <p>Inspection conducted on 19/10/2023 confirmed Golden Sun Moth habitat occurred between KP42.1 to KP 43. The supervisor was aware of environmental sensitivity and instructed construction team accordingly. Rehabilitation line list supplied by SPIECAPAG confirmed no ripping of subsoils occurred around threatened fauna species locations.</p> <p>Inspection conducted on 6/10/2024 between KP 42.95 to 50.2, fauna fence in place. Inspections provided show topsoil piles being stored in accordance with the SSEMP's.</p>         | <p>SPIECAPAG site inspection 19/10/2023.</p> <p>SPIECAPAG site inspection 6/10/2024.</p> | <p>Acceptable</p> <p>Acceptable</p> |
|                                         | <b>Post-construction phase</b><br>Site reinstatement <input checked="" type="checkbox"/> continued topsoil management | <p>In addition to the general reinstatement requirements (Table 3-1), the following elements of APA CEMP EMM B7 apply to the reinstatement of Golden Sun Moth habitat:</p> <p>Patches of native grassland habitat will be revegetated with appropriate native grass seed mix (e.g., Wallaby Grass, Spear Grass, Kangaroo Grass) that provides habitat and food sources. On private property this will be in consultation with landowners.</p>                                                                                                                                                                                           | Inspection conducted on 19/10/2023 confirmed Golden Sun Moth habitat occurred between KP42.1 to KP 43. The supervisor was aware of environmental sensitivity and instructed construction team accordingly. Fauna fencing had been removed at the time of the audit. Auditors confirmed at Property 1 PS733045 native grass was not seeded due to the fact that the property is used for pasture grazing and there had been no native grassland there prior to construction (a possible error with reporting during the ecological surveys). | SPIECAPAG site inspection 19/10/2023.                                                    | Acceptable                          |

|                                            |                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                 |            |
|--------------------------------------------|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|------------|
|                                            |                                                                                     | Soil surfaces will not be ripped as part of the reinstatement process in areas of Golden Sun Moth habitat.                                                                                                                                                                                                                                                                                                                                               | Between KP 42.95 to 50.2, the auditors observed fauna fence in place, confirming no areas of Golden Sun Moth habitat were ripped.                                                                                                                                                                                                                                                                           | SPIECAPAG site inspection 6/10/2024.                            | Acceptable |
| Striped Legless Lizard management measures |                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                 |            |
| 4.3.2                                      | <b>Post-construction phase</b><br>Site reinstatement & continued topsoil management | In addition to the general reinstatement requirements (Table 3-1), the following elements of APA CEMP EMM B7 apply to the reinstatement of Striped Legless Lizard habitat:<br>Habitat that contains native patches of grassland, will be revegetated with appropriate native grass seed mix (e.g., Wallaby Grass, Spear Grass, Kangaroo Grass) that provides habitat and food sources. On private property this will be in consultation with landowners. | Site inspections throughout 2024 undertaken by SPIECAPAG show fenced and marked off areas of Golden Sun Moth and Striped Legless Lizard habitat. The rehabilitation line list supplied by the APA Environmental Advisor confirms no ripping to place in these areas.                                                                                                                                        | SPIECAPAG site inspection 19/10/2023.                           | Acceptable |
|                                            |                                                                                     | Soil surfaces will not be ripped as part of the reinstatement process in areas of Striped Legless Lizard habitat.                                                                                                                                                                                                                                                                                                                                        | The APA Environmental Advisor confirmed ripping of subsoil did not occur in these areas, as per previous requirements. Furthermore, SPIECAPAG site inspection conducted on 4/08/2023 visually confirm fencing and signs were placed to avoid protected areas. Site inspections by SPIECAPAG on 7/8, 8/8 and 9/8/2023 also confirm the striped legless lizard habitats are marked out in the work area.      | SPIECAPAG site inspections in 2024<br>Rehabilitation line list. | Acceptable |
| Kangaroo Management                        |                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                 |            |
| 4.4                                        | Kangaroo Management                                                                 | Surface level impacts will be reinstated to their previous uses following construction. Consequently:<br>The Project will not result in permanent fragmentation of the landscape.                                                                                                                                                                                                                                                                        | On the day of the audit, auditors sighted no permanent fragmentation of the landscape resulting from the project that would impact kangaroo movement.                                                                                                                                                                                                                                                       |                                                                 | Acceptable |
|                                            |                                                                                     | The Project will not result in the creation of permanent barriers to movement or the removal of kangaroo movement corridors.                                                                                                                                                                                                                                                                                                                             | On the day of the audit, auditors sighted no creation of permanent barriers or removal of kangaroo movement corridors.                                                                                                                                                                                                                                                                                      |                                                                 | Acceptable |
|                                            |                                                                                     | The Project will not result in the permanent removal of habitat for kangaroos.                                                                                                                                                                                                                                                                                                                                                                           | On the day of the audit, auditors sighted no permanent removal of habitat occurred, with rehabilitation occurring in accordance with relevant SSEMP's. Kangaroos are known to feed on introduced pasture grasses, meaning there is no loss of feeding habitat along the pipeline easement.<br>A review of site inspection reports conducted by SPIECAPAG confirm no permanent removal of habitats occurred. | SPIECAPAG site inspections in 2024                              | Acceptable |

|                             |           |
|-----------------------------|-----------|
| <b>Percentage Total</b>     |           |
| Acceptable                  | 13        |
| Major non-conformance       | 0         |
| Minor non-conformance       | 0         |
| Observation                 | 0         |
| Opportunity for improvement | 0         |
| Not applicable              | 0         |
| <b>Total</b>                | <b>13</b> |



## PRELIMINARY DRAFT WORM COMMITMENTS REGISTER (Sodic And Dispersive Soil Management Plan Rev0 dated: 16/07/24 )

| Document Section | Title                                           | Extract                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Aventus comments/findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Document reference                                                                     | Compliant?  |
|------------------|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|-------------|
| 1                | Introduction                                    | Soil management practices (including fill) in areas identified as medium to high dispersion risk with consideration of anticipated sodic and dispersive soil exposure, including:<br><br>Rehabilitation of all disturbed areas, including any topsoil treatment and revegetation to manage the soil post-construction (additional to requirements of existing EMMs);<br><br>All required post-construction monitoring and/or management requirements; ensure compliance with the Site Specific Management Plan (SSMP).                                                                                                     | On the day of the audit, auditors sighted topography, infrastructure and appropriate vegetation was as close as reasonably practicably possible to pre-construction conditions at sites visited. Site inspections conducted by SPIECAPAG between September 2023 and August 2024 confirmed on-going reinstatement of topography, infrastructure and vegetation.                                                                                                                                                   | SPIECAPAG site inspections 2023 - 2023                                                 | Acceptable  |
|                  |                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Site inspection and site audit confirm rehabilitation efforts are in line with SSEMPs.                                                                                                                                                                                                                                                                                                                                                                                                                           | SPIECAPAG site inspections 2023 - 2024                                                 | Acceptable  |
| 5.1              | Soil Assessment                                 | Agricultural lime and if dolomite substituted shall be agricultural dolomite consisting of ground limestone (calcium carbonate - CaCO <sub>3</sub> ) with a neutralizing value (NV) of 95 or above; Required Topsoil.                                                                                                                                                                                                                                                                                                                                                                                                      | Rehabilitation line list provided by the APA Environmental Advisor and soil amelioration report from ALS confirm agricultural lime was applied in accordance with SSEMPs.                                                                                                                                                                                                                                                                                                                                        | Rehabilitation line list                                                               | Acceptable  |
|                  |                                                 | Agricultural gypsum (calcium sulfate CaSO <sub>4</sub> 2H <sub>2</sub> O) be a natural agricultural material; Req'd. for Subsoil.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Rehabilitation line list and soil amelioration report from ALS (dated 24 July 2023) confirm gypsum was applied in accordance with SSEMPs.                                                                                                                                                                                                                                                                                                                                                                        | Rehabilitation line list<br>Soil amelioration report from ALS (dated 24 July 2023)     | Acceptable  |
|                  | For Non Sodic Non dispersive                    | All below will need to be addressed to reduce the risk of failure of any soil and top soil site revegetation works and dispersion effects of any disturbed subsoils used due to rainwater ingress and soil dispersive tendency if not ameliorated:<br>- Medium to Strongly acid pH, (but alkaline with depth)<br>- Very low to low salt levels, (well drained)<br>- Low exchangeable calcium (Ca)<br>- Moderate to satisfactory calcium to magnesium ratios (Ca/Mg ratio)<br>- Moderate magnesium & not high when compared to calcium<br>- Low aluminium levels (%Alsat) except occasional topsoil<br>- Non sodic subsoils | For context the following soils occur along the pipeline;<br>KP 19.28-27.95 - highly dispersive<br>KP 28.06-37.03 high risk of sodic and magnetic soils<br>KP 37.18-42.77 - 8 locations classify as high risk of sodic and magnetic soils<br>KP 47.03-end - classified as medium risk of sodic and magnetic soils<br><br><b>Observation</b><br>This condition is too poorly worded to assess.<br>The soil amelioration reports do not contain the detail required to make an assessment against this commitment. | Environmental Soil Solutions and ALS Laboratory amelioration report dated 24 July 2023 | Observation |
|                  | For Sodic dispersive                            | - Medium to Strongly acid pH, (Strongly Alkaline with depth)<br>- Low to moderate salt levels.<br>- Low to moderate low exchangeable calcium (Ca)<br>- Low to moderate calcium to magnesium ratios (Ca/Mg ratio)<br>- Moderate to high magnesium & high when compared to calcium<br>- Low aluminium levels (%Alsat)<br>- Sodic to very strongly sodic soils                                                                                                                                                                                                                                                                | As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                        | Observation |
| 5.2              | Recommended soil amelioration treatments – WORM | Amelioration of the disturbed sodic dispersive soil replaced in pipeline trench.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | The sodic and dispersive MP outlined that sodic soils may occur between KP 28.06 and 50. SPIECAPAG site inspection reports within this KP section verify amelioration occurred through images capturing ripping, application of gypsum and vegetation growth.                                                                                                                                                                                                                                                    | SPIECAPAG site inspections in 2024<br>Rehabilitation line list                         | Acceptable  |

|     |                                                                                                                                          |                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                        |                |
|-----|------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|----------------|
| 5.6 | Auditing (Verification) of ameliorated soil / Rehabilitation                                                                             | It is considered that further sampling and use of modified sub suite testing of particular ameliorated soil (after Ag Gypsum /Lime & organics incorporated) be undertaken to ensure appropriate soil treatments (amelioration) is applied.                                                                               | The rehabilitation line list outlines the level of amelioration at different KP sites along the pipeline (including sodic soils) where gypsum, lime and fertiliser was applied to improve the disturbed sodic dispersive soils. The sodic and dispersive MP outlined that sodic soils may occur between KP 28.06 and 50. SPIECAPAG site inspections verify amelioration occurred through images capturing ripping, application of gypsum and vegetation growth. | SPIECAPAG site inspections in 2024                                                     | Acceptable     |
| 5.7 | Soil Testing & Soil Organic Conditioner Requirements                                                                                     | As a minimum suite of testing the contractor to ensure:<br><br>Soil Organic Conditioner complies with attached specification for 'Soil Organic Conditioner' as AS4454<br><br>For ameliorated stripped soil top layer or subsoils ameliorated with Soil Organic Conditioner & or Ag Lime that sub suite test is supplied. | Amelioration report from SPIECAPAG and ALS (dated 24 July 2023) confirms soil organic conditioners were added to soils in accordance with the soil organic conditioner specifications.                                                                                                                                                                                                                                                                          | Environmental Soil Solutions and ALS Laboratory amelioration report dated 24 July 2023 | Acceptable     |
|     |                                                                                                                                          |                                                                                                                                                                                                                                                                                                                          | Site inspections conducted by SPIECAPAG confirm amelioration at various sites along the pipeline. The rehabilitation line list confirms the regions and amount of Ag Lime that was added to soil.                                                                                                                                                                                                                                                               | SPIECAPAG site inspections in 2024                                                     | Acceptable     |
|     |                                                                                                                                          | Soil Analysis report must be provided with each audit analysis of:<br>1) Ameliorated stripped soil<br>2) Any imported topsoil (if used) &<br>3) Soil Organic Conditioner.                                                                                                                                                | Amelioration report from SPIECAPAG and ALS Laboratory Services (dated 24 July 2023) outlines the levels of:<br>1) Ameliorated stripped soil<br>2) Any imported topsoil (if used) &<br>3) Soil Organic Conditioner.                                                                                                                                                                                                                                              | Environmental Soil Solutions and ALS Laboratory amelioration report                    | Acceptable     |
|     | Table 5 – WORM Project –soil use and or amelioration recommendations for landscape treatments – Site Planting Media & Subsoil Management | Larger plantings / Shrubs Trees<br><br>Mix backfill soil with 15 kg/m3, Ag. Gypsum incorporate or Ag. Gypsum (1-2 kg/m/200mm depth incorporated). Coat excavated planting holes with 1mm thick blanket Ag. Lime Nil                                                                                                      | The APA Environmental Advisor confirmed there were no large plantings of shrubs or trees along the easements. Native vegetation planting were tubestock at waterway crossings.                                                                                                                                                                                                                                                                                  |                                                                                        | Not applicable |
|     |                                                                                                                                          | Tree Pits<br><br>15 - kg/m3, Ag. Gypsum incorporate & mix well Gypsum to excavated tree pit with 1-2mm ag. Gypsum to exposed surface (Coat excavated planting holes with 1-2mm thick blanket Ag. Gypsum Nil                                                                                                              | As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                        | Not applicable |
| 5.3 | Organic Fertiliser alternative for Tree Pits                                                                                             | Apply per cubic metre volume of tree pit:<br><br>1 to 2 bags of “Organo Gardner” (Organic compost fertiliser & Soil Conditioner).                                                                                                                                                                                        | As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                        | Not applicable |
|     |                                                                                                                                          | 1 to 1.5 Kg of “Organo Gardner ” per cu metre mixed in with backfill soil around and next to root ball.                                                                                                                                                                                                                  | As above.                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                        | Not applicable |
| 6   | Soil Pipeline Construction                                                                                                               | Surface of the final topsoil layer to be slightly convex and trimmed to past edge of excavation                                                                                                                                                                                                                          | Site inspections conducted by SPIECAPAG confirm topsoil had a convex profiling applied and was trimmed past edges of excavation.<br><br>On the day of the audit, auditors sighted there was no trench crown visible and that the soil over the trench had the same profile as that of the surrounding soil.                                                                                                                                                     | SPIECAPAG site inspections in 2024                                                     | Acceptable     |
|     |                                                                                                                                          | Subsoil to be placed in layers with appropriate compaction effort                                                                                                                                                                                                                                                        | Field density test reports conducted by A&Y Associates at various locations including Wildwood Rd (1/6/2023), Sunbury Rd (6/4/2023), Guns Gully Rd (20/4/2023), Holden Rd (28/3/2023) and Morefield Ct (17/2/2023) confirm compaction occurred at a moderate or standard amount.                                                                                                                                                                                | Field density test reports conducted by A&Y Associates                                 | Acceptable     |

|  |  |                                                                                                                   |                                                                                                                                                                                                  |                                                                     |            |
|--|--|-------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|------------|
|  |  | Before replacement of subsoil required gypsum to be mixed with subsoil to ensure even distribution within profile | Soil amelioration report supplied by ALS (dated 24 July 2023) outlines the depth at which gypsum was added as well as the indicated amount added in kg/m <sup>3</sup> between Kp 8.3 and 43.230. | Environmental Soil Solutions and ALS Laboratory amelioration report | Acceptable |
|  |  | Topsoil can be ameliorated with Ag Lime before replacement of after but well mixed in.                            | The rehabilitation line list confirms Ag Lime was mixed with topsoil at various sites unless advised not to.                                                                                     | Rehabilitation line list                                            | Acceptable |

|                             |           |                         |
|-----------------------------|-----------|-------------------------|
|                             |           | <b>Percentage Total</b> |
| Acceptable                  | 13        | 68%                     |
| Major non-conformance       | 0         | 0%                      |
| Minor non-conformance       | 0         | 0%                      |
| Observation                 | 2         | 11%                     |
| Opportunity for improvement | 0         | 0%                      |
| Not applicable              | 4         | 21%                     |
| <b>Total</b>                | <b>19</b> |                         |

## Appendix B



KP50 Wollert Compressor Station - base of batters around new compressor area with damaged and strewn sediment fencing.



KP50 Wollert Compressor Station – vegetation coverage surrounding pipeline facility.



KP50 Wollert Compressor Station – rehabilitation surrounding the perimeter of the compressor station with pipeline marker.



KP50 Wollert Compressor Station – stable and flat land surrounding the batters with remains of sediment fencing.



KP48.6 Conservation area 28b – reinstated rock wall across the rehabilitated pipeline right of way, stable ground with minimal vegetation growth.



KP48.6 Conservation area 28b – rock placement and evident edge of pipeline rehabilitation area.



North of Donnybrook Road (adjacent to new residential area) – rehabilitated RoW with fencing and pipeline markers installed.



North of Donnybrook Road (adjacent to new residential area) – rehabilitated vegetation with rock placement.



North of Donnybrook Road (adjacent to new residential area) – rehabilitation adjacent to housing.



North of Donnybrook Road (adjacent to new residential area) – rehabilitated vegetation with pipeline markers evident. Evident vegetation species change along border of pipeline right-of-way.



KP 42 Merri Creek – north bank with vegetation growth and pipeline markers.



KP 42 Merri Creek – old tree with the appropriate signage.



KP 42 Merri Creek – Pipeline marker and pipeline right-of-way border with vegetation growth.



KP 42 Merri Creek – diversion berm along the bank with minimal vegetation growth and bank stabilisation evident.



KP 42 Merri Creek – northern bank stabilisation with tubestock growth and tree placement



KP 42 Merri Creek – downstream view with water movement through the right-of-way and bank stabilisation.



KP 42 Merri Creek – upstream view with bank stabilisation and minimal vegetation cover.



KP 42 Merri Creek – pipeline right-of-way with bank stabilisation, tubestock growth and exposed rock.



KP 22.6 to 22.8 Property 1 PS733045 – rehabilitated pipeline right-of-way and pipeline markers.



KP 22.6 to 22.8 Property 1 PS733045 – vegetation cover and installed fence and gate.



KP 22.6 to 22.8 Property 1 PS733045 – installed fence and vegetation matching the surrounding area.



KP 13.8-14 Jackson Creek – degrading coir logs to control erosion.



KP 13.8-14 Jackson Creek – vegetated area with rock placement.



KP 13.8-14 Jackson Creek – degrading coir logs used to control erosion at the emergency work area.



KP 13.8-14 Jackson Creek – wooden stakes remain in place.



KP 16.8 Deep Creek – revegetated pasture with view of slope rehabilitation.



KP 16.8 Deep Creek – patch of bare soil at former HDD pad, tank and pit site surrounded by rehabilitated pasture.



KP 16.8 Deep Creek – vegetated crop growth area with small soil patch surrounding pipeline marker.



KP 16.8 Deep Creek – soil mounds retained on the property at the landowner's request.



KP 16.8 Deep Creek – berms and vegetation growth upslope.