



Parwan to Melton Pipeline, Victoria

EBPC Act Independent Audit (EPBC Approval 2018/8260)

Prepared for Greater Western Water

Prepared by CH2M Beca Ltd - Australian Branch

CH2M Beca Limited, a New Zealand company (ABN 26 602 541 435)

20 February 2024



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Revision History

Revision N°	Prepared By	Description	Date
A	Fran Soler	Independent audit report	20.02.2024

Document Acceptance

Action	Name	Signed	Date
Prepared by	Fran Soler		20.02.2024
Reviewed by	Melody Valentine		20.02.2024
Approved by	Melody Valentine		20.02.2024
on behalf of	Beca Pty Ltd		

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Executive Summary

Greater Western Water (GWW) received EPBC Act approval (EPBC 2018/8260) allowing actions associated with the construction of a recycled water transfer pipeline, approximately 12 km in length, between Parwan and Melton in Victoria ("the action"). As per Condition 14 of the approval, an independent audit must be conducted every 12 months until the completion of the action, to assess the compliance with the approval. This report details the findings of the first audit which considers 21 November 2022 – 21 November 2023.

The audit assessed a total of 39 compliance requirements from the EPBC Act Approval and Offset Management Plans (OMPs). A total of seven (7) non-compliances were identified, resulting in a compliance rate of 82.1%. A summary of the non-compliances are as follows:

- EPBC Act Approval Condition 2 – The Section 173 Agreement for the 6060 Hamilton Highway, Cressy offset site was not finalised prior to the commencement of the action. It has since been finalised and requires no further action.
- EPBC Act Approval Condition 3 – The covenant for the Mount Gow offset site was registered outside of the required timeframe. The covenant for the Cressy offset site is yet to be registered on title. It is acknowledged that the delay with registering the Mount Gow site is outside of GWW's control, however it is recommended that they continue to monitor and follow-up regularly.
- EPBC Act Approval Condition 4 – DCCEEW was notified by GWW that the Mount Gow offset site had been secure outside of the required 10 business day timeframe. No further action is recommended in this regard.
- EPBC Act Approval Condition 7 – DCCEEW was notified of the commencement of the action outside of the required 10 business day timeframe. No further action is recommended in this regard.
- EPBC Act Approval Condition 12 – There were four non-compliances with the EPBC Act approval that DCCEEW were not notified of within the required 10 business days. It is recommended that GWW make note of reporting timeframe requirements for all future events.
- Mount Gow OMP – Annual report submission – The annual landowner report was not submitted within the required timeframe. It is recommended that GWW make note of reporting timeframe requirements for all future events and communicate these to relevant stakeholders.
- Hamilton Highway OMP – Annual report submission – The annual landowner report was not submitted within the required timeframe. It is recommended that GWW make note of reporting timeframe requirements for all future events and communicate these to relevant stakeholders.

The majority of non-compliances relate to breaches of reporting timeframes, therefore there is a general recommendation that GWW summarise and track these as they approach.

1 Introduction

1.1 Background

The Western Irrigation Network (WIN) Scheme Project includes the construction of the Melton to Bacchus Marsh (M2BM) Interconnector Pipeline & Parwan Balliang Irrigation District (PBID) Supply Network Pump Station and Balance Tank. The project aims to enhance Greater Western Water’s ability to manage the storage and reuse of increasing volumes of recycled water.

This report documents the process and findings of an audit of EPBC Act approval (EPBC 2018/8260). The approval allowed for actions associated the construction of a recycled water transfer pipeline, approximately 12 km in length, between Parwan and Melton in Victoria. As per Condition 14 of the EPBC Act approval an independent audit must be conducted for the 12-month period starting from the commencement of the action. This report details the findings of the first required independent audits for the Parwan to Melton Pipeline project.

1.2 Audit Team

- Melody Valentine
 - Role: Lead Auditor
 - Qualifications:
 - Bachelor of Resource & Environmental Planning (Hons)
 - Lead Auditor: Environmental Management Systems (202566)
 - Experience: Over 15 years of environmental assessment and 10 years of environmental auditing experience.
- Fran Soler
 - Role: Support Auditor
 - Qualifications
 - Bachelor of Environments
 - Master of Urban Planning
 - Approximately 5 years’ experience in the environmental planning and providing support roles to over 10 audits.

Refer to Appendix A for auditors’ certification.

1.3 Audit Details

Item	
Project Name	Parwan to Melton Pipeline, Victoria
Approval Holder	Western Region Water Corporation
Details of the approval to which the audit relates	All requirements of the EPBC Act approval (EPBC 2018/8260) are required to be assessed as part of the independent audit.
Scope of the audit	Compliance with the conditions of EPBC 2018/8260 including implementation of the associated Offset Management Plans.
Dates when and locations where the audit was conducted	A desktop audit was undertaken between 5-15 February 2024. An interview of the project manager (Stephen Campbell) was undertaken on 7 February 2024. A site visit of the M2BM project was undertaken on 14 February 2024.
Methods	<ul style="list-style-type: none">• Review of current and historical spatial mapping

Item	
	<ul style="list-style-type: none"> • Review of supporting evidence – documents and records • On-site assessment of areas of vegetation removal • Interview with approval holder
Evidence reviewed	<ul style="list-style-type: none"> • Year 1 (2022/23) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated January 2024) • Year 1 (2022/23) 6060 Hamilton Highway, Cressy, Victoria Vegetation Assessment Report by Ecology & Heritage Partners (dated November 2023) • Mount Gow, Shelford Section 173 Agreement • 6060 Hamilton Highway, Cressy Section 173 Agreement • Register Search Statement – for Mount Gow Shelford offset site (Volume 9575 Folio 544) • Mount Gow, Shelford OMP prepared by Ecology & Heritage Partners (dated February 2021) • 6060 Hamilton Highway, Cressy OMP prepared by Ecology & Heritage Partners (dated May 2023) • 185 Mount Gow Road, Shelford Landowner Report 2 prepared by Cameron Agriculture Pty Ltd (dated 30/5/23) • Chathams Farm - 6060 Hamilton Highway, Cressy Landowner Report (Year 1 / November 2022- November 2023) prepared by Warrambeen Offset Management (dated 9/10/23) • Monthly audit reports of the Melton to Bacchus Marsh Interconnector Pipeline project prepared by CH2M Beca Limited, dated November 2022- September 2023 • GWW WIN project website • Email correspondence from S. Campbell to DAWE (dated 22/12/22 12:59pm) • Email correspondence from Trust for Nature to S. Campbell (dated 10/10/23 2:11pm) • Email correspondence from S. Campbell to DCCEEW (dated 13/12/22 1:52pm) • Email correspondence to the Department from S. Campbell advising of the publishing of the vegetation assessment report including the landowner report (dated 30/01/2024 2:26pm). • Internal GWW email correspondence confirming the publication of the OMPs on the GWW website (dated 16/01/23 2:29pm) • Agreement to audit criteria letter from DCCEEW, dated 21/12/23 • Email from S. Campbell to audit@dcceew.gov.au dated 30.8.23, 2:24pm • Email from S. Campbell to audit@dcceew.gov.au dated 29/11/23, 3:57pm • 185 Mount Gow Road, Shelford Landowner Report 1 prepared by Cameron Agriculture Pty Ltd (dated 30/5/22)

Item	
	<ul style="list-style-type: none">• Email correspondence to TfN and S. Campbell from Cameron Agriculture with the year 1 landowner report and photo monitoring (dated 28/07/23 3:41pm).• Email correspondence to TfN and S. Campbell from Cameron Agriculture with the year 2 landowner report and photo monitoring (dated 31/07/23 4:18pm).

2 Compliance Evaluation

2.1 Compliance status descriptors

The following compliance status descriptors have been used to evaluate compliance:

- Compliance – A rating of ‘compliance’ is given when the auditee has complied with a condition or element of a condition.
- Non-compliance – A rating of ‘non-compliance’ is given when the auditee has not met a condition or an element of a condition.
- Not applicable – A rating of ‘not applicable’ at the time of the audit is given when the condition or element of a condition falls outside the scope of the audit e.g. if an activity has not yet commenced or a requirement has not been triggered.
- Observation – An ‘observation’ may be made about issues relevant to the protection of a matter of national environmental significance when the issue is not strictly related to compliance or non-compliance with a condition or element of a condition.

2.2 Compliance Findings

2.2.1 EPBC Act Approval Conditions

Compliant	Non-Compliant	Not Applicable
9	5	3

2.2.2 OMP Requirements

Compliant	Non-Compliant	Not Applicable
18	2	2

A total of 39 compliance requirements were reviewed during the audit. Out of the total applicable items there were seven (7) non-compliances identified, providing a compliance rate of 82.1%.

The audit identified that the majority of the non-compliances related to not completing actions within specified timeframes, including notification to DCCEEW and items involving the securing and registration of the offset sites.

Condition	Non-Compliance Description	Recommended Action
2	The Section 173 Agreement for the 6060 Hamilton Highway, Cressy offset site was not finalised prior to the commencement of the action.	No further action recommended
3	The covenant for the Mount Gow offset site was registered outside of the required timeframe. The covenant for the Cressy offset site is yet to be registered.	The approval holder should continue to monitor and follow-up the registration of the covenant.
4	DCCEEW was notified by GWW that the Mount Gow offset site had been secure outside of the required 10 business day timeframe.	No further action recommended
Mount Gow OMP – Annual report submission	The annual landowner report was not submitted within the required timeframe.	Future annual reports should be submitted within the required timeframe or an extension should be sought as early as possible.

Condition	Non-Compliance Description	Recommended Action
Hamilton Highway OMP – Annual report submission	The annual landowner report was not submitted within the required timeframe.	Future annual reports should be submitted within the required timeframe or an extension should be sought as early as possible.
7	DCCEEW was notified of the commencement of the action outside of the required 10 business day timeframe.	No further action recommended
12	There were four non-compliances with the EPBC Act approval that DCCEEW were not notified of within the required 10 business days.	DCCEEW should be notified of any future incidents or non-compliances with the EPBC Act approval or OMPs as soon as practicably possible or within 2 business days after becoming aware of the incident or non-compliance.

Refer to Appendix B for a detailed compliance assessment.

2.3 Opportunities for Improvement

The majority of non-compliances related to not completing actions within specified timeframes. Therefore, it is recommended that GWW summarise and tracks timeframes, as they are triggered.

While the objectives of the OMPs are to be achieved over the lifetime of the OMP (10 years), the findings of the Mount Gow Monitoring Report indicated a concerning trajectory. The monitoring report has made recommendations for the year ahead to improve the condition and extent of the Golden Sun Moth habitat, this audit recommends that those actions be adopted.

2.4 Strengths

It was identified that during the works there was a reduction in the cleared areas resulting in a lesser impact on the Golden Sun Moth habitat and NTGVVP in the area. The reduction of impacted vegetation is a result of the relocation of the Greenhill Road laydown area and avoidance of areas of Tussock Skink habitat where possible.



Appendix A – Auditors’ Certification

Appendix A—Auditor's Declaration of Independence

I, [name of auditor] Melody Valentine of [name of organisation and full address] CH2M Beca Limited, 5 Queens Road, Melbourne

declare that to the best of my knowledge and belief I and my organisation do not have any conflicting or competing interests with:

The Auditee [name of Auditee] Greater Western Water

_____, the Auditee's staff or representatives or other persons associated with the Auditee, including any personal, financial, business or employment relationship, except to the extent detailed below.

The project to be audited [name of EPBC Act project] EPBC 2018-8260 - Parwan to Melton Pipeline

I shall notify the Department of the Environment within seven days of any change in these circumstances or any other change that may affect my independent status.

I shall at all times observe any professional code of conduct and/or ethics applicable to undertaking audits (i.e. – as prescribed by the agency with which I hold accreditation/membership). I take full responsibility for any factual inaccuracy or mistake made in giving this declaration, particularly to the extent that others rely upon the truth of this declaration. I acknowledge that the Department of the Environment may request further information to verify my independence at any time.

Details of any personal, financial, business or employment relationship with the Auditee, the Auditee's staff, representatives or associated persons. (This is in the context of both the person making the declaration and the organisation that they are employed by – specify 'nil' if none):

CH2M Beca has a Master Services Agreement with Greater Western Water, through which it delivers engineering and related services across a wide range of services. Each project is subject to an evaluation and engagement process.

Details of any personal, financial, business or employment relationship with the project to be audited. (This is in the context of both the person making the declaration and the organisation that they are employed by – specify 'nil' if none):

CH2M Beca prepared the engineering design and sought the environmental and planning approvals for the M2BM Project, which this approval applies to.

Melody is part of the team that is currently engaged by Greater Western Water to undertake monthly audits of Greater Western Waters compliance with its environmental and planning approvals.

Melody has not been involved in preparation of the EPBC application, taking the action, or preparation of any management plans or compliance documentation required under the approval.

Details of audit qualifications and professional accreditations/memberships. (Include copies of current audit qualifications and current professional accreditations/memberships):

Melody is a Certified Environmental Practitioner and an accredited Lead Environmental Auditor.

Appendix C—Audit Report— Auditor’s Certification

Auditor’s name, position, company and contact details: *Melody Valentine, Lead Auditor, CH2M Beca
melody.valentine@beca.com*
Auditor’s qualifications and/or experience: *Bachelor of Resource & Environmental Planning (Hons)
Lead Auditor: Environmental Management Systems (20256)*
Auditor’s declaration: *Over 15 years of environmental assessment and
10 years of environmental auditing experience*

I, *Melody Valentine*.....(name of auditor)

- For environmental audits that are required by a condition of an *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval I certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct and complete.

I am aware that section 491 of the EPBC Act makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both.

- For directed environmental audits that are required pursuant to section 458 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) I certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct and complete.

I am aware that section 461(4) of the EPBC Act makes it an offence in certain circumstances for an environmental auditor to include a statement in an audit report that is false or misleading in a material particular. The offence is punishable on conviction by imprisonment for not more than 6 months.

Signature: *Melody Valentine*
Date: *20/02/2024*

Note: Modify the auditor’s certification to reflect whether the environmental audit was required by a condition of an EPBC Act approval or directed pursuant to section 458 of the EPBC Act.

Appendix A—Auditor's Declaration of Independence

I, *[name of auditor]* Francesca Soler of *[name of organisation and full address]* CH2M Beca Ltd, 5 Queens Road, Melbourne

declare that to the best of my knowledge and belief I and my organisation do not have any conflicting or competing interests with:

The Auditee *[name of Auditee]* Greater Western Water

_____, the Auditee's staff or representatives or other persons associated with the Auditee, including any personal, financial, business or employment relationship, except to the extent detailed below.

The project to be audited *[name of EPBC Act project]* EPBC 2018-8260 - Parwan to Melton Pipeline

I shall notify the Department of the Environment within seven days of any change in these circumstances or any other change that may affect my independent status.

I shall at all times observe any professional code of conduct and/or ethics applicable to undertaking audits (i.e. – as prescribed by the agency with which I hold accreditation/membership). I take full responsibility for any factual inaccuracy or mistake made in giving this declaration, particularly to the extent that others rely upon the truth of this declaration. I acknowledge that the Department of the Environment may request further information to verify my independence at any time.

Details of any personal, financial, business or employment relationship with the Auditee, the Auditee's staff, representatives or associated persons. (This is in the context of both the person making the declaration and the organisation that they are employed by – specify 'nil' if none):

CH2M Beca has a Master Services Agreement with Greater Western Water, through which it delivers engineering and related services across a wide range of services. Each project is subject to an evaluation and engagement process.

Details of any personal, financial, business or employment relationship with the project to be audited. (This is in the context of both the person making the declaration and the organisation that they are employed by – specify 'nil' if none):

CH2M Beca prepared the engineering design and sought the environmental and planning approvals for the M2BM Project, which this approval applies to.

Fran is part of the team that is currently engaged by Greater Western Water to undertake monthly audits of Greater Western Waters compliance with its environmental and planning approvals.

Fran has not been involved in preparation of the EPBC application, taking the action, or preparation of any management plans or compliance documentation required under the approval.

Details of audit qualifications and professional accreditations/memberships. (Include copies of current audit qualifications and current professional accreditations/memberships):

Fran is a Full Member of the Planning Institute of Australia.

Appendix C—Audit Report— Auditor’s Certification

Auditor’s name, position, company and contact details: *Francesca Soler, Planner, Beca Pty Ltd,
fran.soler@beca.com*

Auditor’s qualifications and/or experience: *Bachelor of Environments Master of Urban
Planning, Approximately 5 years’ experience in
environmental planning and providing
support roles to over 10 audits.*

Auditor’s declaration:

I, *Francesca Soler*.....(name of auditor)

- For environmental audits that are required by a condition of an *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval I certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct and complete.
- I am aware that section 491 of the EPBC Act makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both.
- For directed environmental audits that are required pursuant to section 458 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) I certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct and complete.

I am aware that section 461(4) of the EPBC Act makes it an offence in certain circumstances for an environmental auditor to include a statement in an audit report that is false or misleading in a material particular. The offence is punishable on conviction by imprisonment for not more than 6 months.

Signature: *[Signature]*

Date: *20/2/24*

Note: Modify the auditor’s certification to reflect whether the environmental audit was required by a condition of an EPBC Act approval or directed pursuant to section 458 of the EPBC Act.

B

Appendix B – Audit Criteria and Methodology

Audit Criteria and Methodology

Parwan to Melton Pipeline, Victoria (EPBC 2018/8260)

Client: Greater Western Water (previously Western Region Water Corporation)

DATE OF REPORT: 20/02/2024

REPORT PREPARED BY: Melody Valentine/Francesca Soler

REPORT APPROVED BY: Stephen Campbell 20/02/24

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
1	Within the project area, the approval holder must not clear more than:	Undertake a site inspection to see that no unauthorised clearance has occurred.	GWW reported that no unapproved clearance of Golden Sun Moth habitat of NTGVVP has occurred.	Interview with S. Campbell from GWW on 7/2/24. Site visit on 14/2/23 Review of spatial mapping of the site (NearMap)	Clearance of Golden Sun Moth habitat and NTGVVP was in accordance with the EPBC Act approval. In some areas of the project alignment there had been less clearing than of the allowed amount. Impact has been avoided to more than 1000m2 of land approved for clearance amounts and therefore this item is deemed compliant.	COMPLIANT
	a. 10.459 hectares of Golden Sun Moth habitat.	Site visit to be photographically documented.	A site visit was conducted on 14/2/24 which confirmed that all clearing of vegetation was in accordance with the requirements EPBC Act approval. (Refer Appendix C)			
	b. 4.961 ha of NTGVVP	Review any available spatial records from construction vehicles. Review compliance report.	A review of historical and current spatial mapping of the project area demonstrated that no additional clearing had occurred.			

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
2	Prior to the commencement of the action, to compensate for the loss of 10.459 ha of Golden Sun Moth habitat and the loss of 4.961 ha of NTGVVP, the approval holder must protect the offset areas by finalising a Section 173 agreement under the <i>Planning and Environment Act 1987</i> (Vic). The Section 173 Agreement must not be removed unless the site is secured.	Review a copy of signed Section 173 agreement.	<p>GWW advised DCCEW that the date of commencement of action was 21/11/22.</p> <p>The Section 173 Agreement between Golden Plains Shire Council, Crichton Properties Pty Ltd and Western Region Water Corporation is dated 29/06/2021. The agreement stipulates that Owner has agreed to the land being used to offset the loss of 5.26ha of Golden Sun Moth Habitat</p> <p>The Section 173 Agreement between Colac Otway Shire Council, RD Griffiths Trading Pty Ltd and Greater Western Water Corporation is dated 30/11/2022. The agreement stipulates that Owner has agreed to the land being used to offset the loss of 5.2ha of Golden Sun Moth Habitat and 4.961ha of NTGVVP.</p>	<p>Email correspondence from S. Campbell to DCCEW (dated 22/12/22 12:59pm)</p> <p>Mount Gow, Shelford Section 173 Agreement</p> <p>6060 Hamilton Highway, Cressy Section 173 Agreement</p>	The Section 173 Agreement for the Mount Gow, Shelford offset site was secured before the 21/11/22, however the Section 173 Agreement for the 6060 Hamilton Highway, Cressy was finalised after the date of the commencement of action. As one of the Section 173 Agreements were not finalised prior to the commencement of the action this condition is determined to be non-compliant.	NON-COMPLIANT
3	Within 24 months of this approval the offset areas must be secured.	Review Certificate of Title to confirm a conservation covenant is registered on the applicable title(s).	<p>The covenant for the Mount Gow, Shelford offset is registered on the title, dated 20/06/23.</p> <p>While the Deed has been executed, the covenant for the 6060 Hamilton Highway,</p>	<p>Register Search Statement – for Mount Gow Shelford offset site (Volume 9575 Folio 544)</p> <p>Email correspondence from Trust for Nature to S. Campbell (dated 10/10/23 2:11pm)</p>	The date of this approval was 4/5/21 and therefore the conservation covenants for both of the offset sites were required to be registered on the	NON-COMPLIANT

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
			Cressy offset site has not yet been registered. The GWW project manager reported that they had followed up with Trust For Nature regarding the status of the covenant registration and Trust For Nature have been advised that the covenant has been with the Minister for signing since October 2023.		relevant titles by 4/5/23. As the Cressy offset site covenant has not yet been registered and the covenant for the Mount Gow offset site was registered after the 4/5/23, this item has been determined to be non-compliant.	
4	<p>Within 10 business days of each offset area being secured, the approval holder must provide the department with:</p> <p>written evidence demonstrating that all the offset area has been secured; and</p> <p>shapefiles and the offset attributes for the offset area.</p>	Review a dated copy of the correspondence provided to the Department containing written evidence, shapefiles and offset attributes.	On the 13/12/22, GWW advised DCCEEW that offset sites had been secured including signed Section 173 agreements for both offset sites and shapefiles for the secured offset sites. The date of the Section 173 agreements are 29/06/21 (Mount Gow, Shelford) 30/11/22 (6060 Hamilton Highway, Cressy).	<p>Email correspondence from S. Campbell to DCCEEW (dated 13/12/22 1:52pm)</p> <p>Email correspondence from S. Campbell to DCCEEW (dated 22/12/22 12:59pm)</p>	GWW was required to advise the Department that each off the offset sites had been secured by 13/7/21 (Mount Gow, Shelford) and 14/12/22 (6060 Hamilton Highway, Cressy). However, GWW emailed the department on the 22/12/22 and therefore the notification to DAWE for the Mount Gow offset site was undertaken outside of the required 10 business days.	NON-COMPLIANT

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
5	Prior to the commencement of the action, the approval holder must implement the Offset Management Plan for each offset area and must continue to implement the Offset Management Plan for each offset area for the duration of the approval.	Review a copy of the Offset Management Plan(s). Review a copy of the latest annual monitoring report and photographs required under the Offset Management Plan(s).	The Mount Gow OMP was prepared February 2021. The 6060 Hamilton Highway, Cressy OMP was prepared May 2022. Both OMPs were prepared and implemented prior to the date of commencement of action (21/11/22).	Mount Gow, Shelford OMP prepared by Ecology & Heritage Partners (dated February 2021) 6060 Hamilton Highway, Cressy OMP prepared by Ecology & Heritage Partners (dated May 2023) Email correspondence from S. Campbell to DCCEEW (dated 22/12/22 12:59pm)	Both OMPs were prepared and implemented prior to the commencement of the action. Additionally, they are still actively being implemented and therefore GWW is compliant with this requirement.	COMPLIANT
	Mount Gow OMP:					
	Maintenance and protection of the offset site will be achieved by: <ul style="list-style-type: none"> Stock-proof fencing around the boundary of the offset site; Weed control through active management; Biomass control through high intensity pulse grazing of domestic stock with stock generally excluded from 1st 	Review the monitoring report undertaken by an independent party to confirm all of these controls are in place.	A Vegetation Assessment Report has been prepared by EHP for the Year 1 (2022/23) monitoring of Mount Gow, Shelford Victoria (dated January 2024). The report assesses the success of actions undertaken and compliance with the requirements of the OMP. An assessment of measures such as fencing, weed control, biomass control, and pest animal control are included in the report. It is noted that the landowner report (dated May 2023) has only included activities occurring in 2022.	Year 1 (2022/23) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated January 2024)	The Year 1 monitoring report for the Mount Gow, Shelford site details actions that have been undertaken as per the requirements of the OMP. The monitoring report has identified that all management actions required by the OMP for the maintenance and protection of the offset site have been completed in Year 1 and therefore this item is deemed compliant. It is recommended that activities included within future landowner reports	COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
<p>October to 31st January;</p> <ul style="list-style-type: none"> Controlling pest animals, particularly rabbits and foxes; and Managing native species understorey diversity and recruitment. 				align with the dates of the assessment period.	
Maintain fencing in good condition around entire boundary of all sites where fencing exists or is required.	Review the monitoring report undertaken by an independent party to confirm adequate fencing is in place	The site assessment identified that the existing permanent stock-proof fencing had been maintained and was in good condition. All fencing around the offset area was in good condition with no fence gaps recorded.	Year 1 (2022/23) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated January 2024)	The Year 1 monitoring report for the Mount Gow, Shelford site identified that the fencing around the offset was in good condition and had been maintained appropriately and therefore this item is deemed compliant.	COMPLIANT
Erect temporary fencing around offset site during grazing exclusion period (if stock present during this period within the property cannot be confined to certain areas).	Review the monitoring report undertaken by an independent party to confirm adequate fencing is in place	The assessment report and landowner report does not discuss the erection of temporary fencing. However, there has been some fence maintenance and the landowner report discusses the repair and ongoing assessment of fencing. The assessment report also noted that that fencing	Year 1 (2022/23) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated January 2024)	The Year 1 monitoring report for the Mount Gow, Shelford site did not report any new fencing, however all fencing was maintained in good condition with no gaps recorded. The assessment report identified that all fencing requirements had been	COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
		management actions on the site were all completed in alignment with the requirements outlined in the OMP.		met and therefore this item is deemed compliant.	
Establish posts to mark the boundary of the offset site in accordance with advice from a qualified ecologist and land surveyor.	Review the monitoring report undertaken by an independent party to confirm marked posts are in place.	The Year 1 landowner report noted that posts with white drums had been erected to mark the corners of the offset site. The assessment report did also confirmed that fencing has been maintained to establish the boundary of the offset site.	Year 1 (2022/23) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated January 2024) 185 Mount Gow Road, Shelford Landowner Report 1 prepared by Cameron Agriculture Pty Ltd (dated 30/5/22)	As the boundary of the offset site has been established this item is deemed compliant.	COMPLIANT
Eliminate all new and emerging woody weeds.	Review the monitoring report undertaken by an independent party to confirm weed control is adequate.	In Year 1 monitoring all woody weeds were appropriately managed on the offset site with a reduction to <1% cover.	Year 1 (2022/23) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated January 2024)	The Year 1 monitoring report for the Mount Gow, Shelford site identified that all new and emerging woody weeds had been managed in line with the requirements of the OMP.	COMPLIANT
Control all herbaceous weeds.	Review the monitoring report undertaken by an independent party to confirm weed control is adequate.	The site assessment identified that the overall cover of weeds within the offset area was estimated between 71-95% which was largely due to the expansion of Toowoomba Canary Grass which had a varied cover of 45-60% across the offset	Year 1 (2022/23) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated January 2024)	The Year 1 monitoring report for the Mount Gow, Shelford site identified that ongoing weed control actions are required. While the area of weed coverage had not decreased, management actions	COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
		area. Weeds had been controlled in accordance with the requirements of the OMP however, new emerging weeds will need to be controlled during the following years. Intensive active management will be required to ensure that the percentage of cover meets the requirements of the OMP.		had still been undertaken as per the requirements of the OMP and therefore this item is deemed compliant.	
Eliminate all new & emerging herbaceous weeds.	Review the monitoring report undertaken by an independent party to confirm weed control is adequate.	The assessment identified that the cover of native grasses and herbaceous plants reduced considerably due to presence of Toowoomba Canary Grass. Ongoing weed control measures will be required to reduce the emergence of weeds during following years.	Year 1 (2022/23) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated January 2024)	The Year 1 monitoring report for the Mount Gow, Shelford site identified that ongoing weed control actions are required to eliminate new and emerging weeds on the site. While ongoing weed control measures are required, management actions had still been undertaken as per the requirements of the OMP and therefore this item is deemed compliant.	COMPLIANT
Monitor and control rabbits and foxes.	Review the monitoring report undertaken by an independent party to	Ongoing monitoring of pest animals has been undertaken with spot lighting and shooting of animals	Year 1 (2022/23) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by	The Year 1 monitoring report for the Mount Gow, Shelford site identified that the	COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	confirm pest control is adequate.	undertaken monthly when stock was not in the area. During the site assessment by EHP one rabbit warren was recorded in the south of the offset area, approximately 700 metres to the south of the golden Sun Moth offset area. In accordance with the OMP the warren must be controlled immediately.	Ecology & Heritage Partners (dated January 2024)	monitoring and control of rabbits and foxes on the site had been undertaken in compliance with the requirements of the OMP.	
Monitor and control all new and emerging pest animals.	Review the monitoring report undertaken by an independent party to confirm pest control is adequate.	Regular ongoing monitoring of pest animals is undertaken on the offset site and no new threats identified.	Year 1 (2022/23) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated January 2024)	Monitoring and control of new and emerging pest animals on the offset site are being undertaking in compliance with the requirements of the OMP.	COMPLIANT
Prepare and submit an annual report and photo monitoring to TfN and DAWE: <ul style="list-style-type: none"> Annual report is signed, dated and submitted by the Landowner at least 2 months prior to the anniversary date of on-title 	Sight a copy of the final annual report and correspondence confirming its submission to TfN and DAWE. Confirm that these requirements have been met.	A year 1 and year 2 landowner report has been prepared for the offset site at 185 Mount Gow Road, Shelford (dated 30/5/22 and 30/05/2023). The report records management actions undertaken in accordance with the OMP and photographic evidence of these actions. Cameron Agriculture provided the year 1 report to TfN and GWW on	Email correspondence to the TfN and S. Campbell from Cameron Agriculture with the year 1 landowner report and photo monitoring (dated 28/07/23 3:41pm). Email correspondence to the TfN and S. Campbell from Cameron Agriculture with the year 2 landowner report and photo monitoring (dated 31/07/23 4:18pm).	The landowner report details the management activities that have been completed through comments and photographic evidence, as per the requirements of the OMP. The year 1 and 2 reports were submitted to the required parties and the year 2 report was provided to DCCEEW.	NON-COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
<p>agreement registration.</p> <ul style="list-style-type: none"> Report provides enough detail in the form of written comments and supporting evidence that an assessor can easily determine the completion of / progress against the commitments for the offset site. Allow for ongoing auditing of the effectiveness of management. Reports will include a review of past management works against the performance targets and objectives contained within this OMP. Future management priorities will also be detailed in these reports. Obligations of the Landowner have 		<p>28/7/23. Cameron Agriculture provided the year 2 report to TfN and GWW on 31/7/23.</p> <p>GWW advised the Department on 30/1/2024 that the vegetation assessment report for the offset site, which includes the year 2 landowner's report as an appendix, had been published to the GWW WIN project website. GWW did not forward on the year 1 monitoring report to DCCEE.</p>	<p>185 Mount Gow Road, Shelford Landowner Report 1 prepared by Cameron Agriculture Pty Ltd (dated 30/5/22)</p> <p>185 Mount Gow Road, Shelford Landowner Report 2 prepared by Cameron Agriculture Pty Ltd (dated 30/5/23)</p> <p>Email correspondence to the Department from S. Campbell advising of the publishing of the vegetation assessment report including the landowner report (dated 30/01/2024 2:26pm).</p>	<p>However, the Section 173 registration is dated 22/7/2021 requiring submission of the reports by the 22/5 annually. Therefore, submission of both reports to TfN, GWW and Department was not undertaken within the required timeframe resulting in a non-compliance.</p>	

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
been met and the obligations form is signed, dated and submitted with the annual report.					
Review effectiveness of OMP: <ul style="list-style-type: none"> Review of OMP after 5 years if there is no improvement of the GSM population. 	Not applicable – 5 years has not yet passed.	Not applicable	Not applicable	Not applicable	NOT APPLICABLE
Hamilton Highway OMP – V3:					
Maintenance and protection of the offset site will be achieved by: <ul style="list-style-type: none"> Stock-proof fencing around the boundary of the offset site and low impact fencing dividing the site into smaller more manageable paddocks; Weed control through active management; 	<ul style="list-style-type: none"> Review the monitoring report undertaken by an independent party to confirm all of these controls are in place. 	A Vegetation Assessment Report has been prepared by EHP for the Year 1 (2022/23) monitoring of 6060 Hamilton Highway, Cressy, Victoria (dated November 2023). The report assesses the success of actions undertaken and compliance with the requirements of the OMP. An assessment of measures such as fencing, weed control, biomass control, and pest animal control are included in the report.	Year 1 (2022/23) 6060 Hamilton Highway, Cressy, Victoria Vegetation Assessment Report by Ecology & Heritage Partners (dated November 2023)	The Year 1 monitoring report for the Mount Gow, Shelford site details actions that have been undertaken as per the requirements of the OMP. The monitoring report has identified that all management actions required by the OMP for the maintenance and protection of the offset site have been completed in Year 1 and therefore this item is deemed compliant.	COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
<ul style="list-style-type: none"> Biomass control through light grazing of domestic stock (sheep only) with stock generally excluded from 1st October to 31st January; Controlling pest animals, particularly rabbits and foxes; and Managing native species understorey diversity and recruitment. 					
Establish fence around the boundary of the offset site in accordance with advice from a qualified ecologist and land surveyor.	Review the monitoring report undertaken by an independent party to confirm adequate fencing is in place	The landowner completed the installation of fencing in Winter 2023 with minimal soil disturbance. Images of new fencing have been provided.	Year 1 (2022/23) 6060 Hamilton Highway, Cressy, Victoria Vegetation Assessment Report by Ecology & Heritage Partners (dated November 2023)	The Year 1 monitoring report for the Cressy site identified that a new fence had been established as per the requirements of the OMP.	COMPLIANT
Maintain fencing in good condition to appropriately exclude unintended grazing by livestock over the 10 year management period.	Review the monitoring report undertaken by an independent party to confirm adequate fencing is in place	Fencing was recently installed and is currently in good condition.	Year 1 (2022/23) 6060 Hamilton Highway, Cressy, Victoria Vegetation Assessment Report by Ecology & Heritage Partners (dated November 2023)	The Year 1 monitoring report for the Cressy site identified that the fence had been installed had been maintained and was in good condition as per the	COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
				requirements of the OMP.	
Control new and emerging woody weeds.	Review the monitoring report undertaken by an independent party to confirm weed control is adequate.	Ongoing weed control and monitoring has occurred on the offset site. The landowner has prepared a weed control log and will continue with the same calendar of activities.	Year 1 (2022/23) 6060 Hamilton Highway, Cressy, Victoria Vegetation Assessment Report by Ecology & Heritage Partners (dated November 2023)	The Year 1 monitoring report for the Cressy site identified ongoing weed control management actions had been undertaken on the site and therefore this item is deemed compliant.	COMPLIANT
Control herbaceous weeds.	Review the monitoring report undertaken by an independent party to confirm weed control is adequate.	Herbaceous weed cover within the offset area has reduced from 45% to 37% during the Year 1 monitoring. There has been a considerable reduction in the total cover of environmental and noxious weeds, however ongoing intensive and integrated weed management is required.	Year 1 (2022/23) 6060 Hamilton Highway, Cressy, Victoria Vegetation Assessment Report by Ecology & Heritage Partners (dated November 2023)	The Year 1 monitoring report for the Cressy site identified ongoing weed control management actions had been undertaken on the site and therefore this item is deemed compliant.	COMPLIANT
Control all new & emerging herbaceous weeds.	Review the monitoring report undertaken by an independent party to confirm weed control is adequate.	There has not been any new or emerging herbaceous weeds identified, however ongoing intensive and integrated weed management is required to continue weed reduction across the offset site.	Year 1 (2022/23) 6060 Hamilton Highway, Cressy, Victoria Vegetation Assessment Report by Ecology & Heritage Partners (dated November 2023)	The Year 1 monitoring report for the Cressy site identified that there had been no new or emerging herbaceous weeds that required controlling and therefore this item is deemed compliant.	COMPLIANT
Monitor and control rabbits and foxes.	Review the monitoring report undertaken by an	Baseline monitoring was undertaken in November	Year 1 (2022/23) 6060 Hamilton Highway, Cressy, Victoria	The Year 1 monitoring report for the Cressy	COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	independent party to confirm pest control is adequate.	2023 and no rabbits were identified within the offset area at the time of assessment. One European Hare was identified approximately 500 metres north-west of the offset area. Additionally, no indirect evidence, such as rabbit warrants, scats, tracks and diggings, were identified during the assessment. While spotlighting in May 2023 one fox was identified and shot. Subsequent spotlighting in September 2023 did not identify any additional foxes.	Vegetation Assessment Report by Ecology & Heritage Partners (dated November 2023)	site identified that the monitoring and control of rabbits and foxes on the site had been undertaken in compliance with the requirements of the OMP.	
Monitor and control all new and emerging pest animals.	Review the monitoring report undertaken by an independent party to confirm pest control is adequate.	Monitoring of potential new and emerging pest animals is ongoing on the offset site.	Year 1 (2022/23) 6060 Hamilton Highway, Cressy, Victoria Vegetation Assessment Report by Ecology & Heritage Partners (dated November 2023)	Monitoring and control of new and emerging pest animals on the offset site are being undertaking in compliance with the requirements of the OMP.	COMPLIANT
Monitor organic litter and grass density and enact ecological burn or other biomass reduction plan if appropriate.	Review the monitoring report undertaken by an independent party to confirm these controls are in place.	The organic litter on the site was compliant with the OMP requirements. The benchmark cover for organic litter is 10% and the organic litter recorded on the site was approximated at 8%,	Year 1 (2022/23) 6060 Hamilton Highway, Cressy, Victoria Vegetation Assessment Report by Ecology & Heritage Partners (dated November 2023)	The organic litter and grass density on the offset site were monitored in compliance with the requirements of the OMP.	COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
		dominated by native organic litter.			
<p>Prepare and submit an annual report and photo monitoring to TfN and Approval Holder:</p> <ul style="list-style-type: none"> Report provides enough detail in the form of written comments and supporting evidence that an assessor can easily determine the completion of / progress against the commitments for the offset site. Report will also include photos that are reviewed by a qualified ecologist. Allow for ongoing assessment of the effectiveness of management. Reports will include a review 	Sight a copy of the final annual report and correspondence confirming its submission to TfN and DAWE. Confirm that these requirements have been met.	<p>A landowner report has been prepared for the offset site at 6060 Hamilton Highway, Cressy (dated 9/10/2023). The report records management actions undertaken in accordance with the OMP and photographic evidence of these actions. Warrambeen issued the landowner report on 11/12/23.</p> <p>GWW advised the Department on 30/1/2024 that the vegetation assessment report for the offset site, which includes the landowner's report as an appendix, had been published to the GWW WIN project website.</p>	<p>Chathams Farm - 6060 Hamilton Highway, Cressy Landowner Report (Year 1 / November 2022- November 2023) prepared by Warrambeen Offset Management (dated 9/10/23)</p> <p>Email correspondence to the Department from S. Campbell advising of the publishing of the vegetation assessment report including the landowner report (dated 30/01/2024 2:26pm).</p> <p>Email correspondence from S. Broadley (Warrambeen Offsets) to TfN regarding the landowner report (dated 11/12/23)</p>	The landowner report details the management activities that have been completed through comments and photographic evidence, as per the requirements of the OMP. The report has been signed and submitted to the required parties. However, the Section 173 registration is dated 30/11/2022 and requires submission of the report by the 20/9 annually. Therefore, submission to TfN, GWW and the Department was not undertaken within the required timeframe resulting in a non-compliance.	NON-COMPLIANT

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	<p>of past management works against the performance targets and objectives contained within this OMP. Future management priorities will also be detailed in these reports.</p> <ul style="list-style-type: none">Obligations of the landowner have been met and the obligations form is signed, dated and submitted with the annual report.					
	<p>Review effectiveness of OMP:</p> <ul style="list-style-type: none">Review of OMP after 5 years if there is no improvement of the GSM population.	Not applicable – 5 years has not yet passed.	Not applicable	Not applicable	Not applicable	NOT APPLICABLE

6	<p>If the approval holder wishes to carry out any activity within an offset area other than in accordance with the Offset Management Plan, the approval holder must submit a revised version of the Offset Management Plan to the department for the Minister's written approval. The approval holder must not commence the varied activity until the Minister has approved the varied management plan in writing. If the Minister approves the revised Offset Management Plan, the revised version must be implemented. A revised Offset Management Plan must not result in a reduced environmental outcome for the Golden Sun Moth or NTGVVP.</p>	<p>Review a copy of the latest annual monitoring report and photographs required under the Offset Management Plan(s).</p>	<p>Separate annual monitoring reports have been prepared by EHP for the Mount Gow, Shelford offset site and the 6060 Hamilton Highway, Cressy offset site. The monitoring reports detail all required management actions as per the OMP and assess actions that have been undertaken on each site over the past year. Neither reports have identified any activities that were not previously included within the approved OMPs.</p>	<p>Year 1 (2022/23) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated January 2024) Year 1 (2022/23) 6060 Hamilton Highway, Cressy, Victoria Vegetation Assessment Report by Ecology & Heritage Partners (dated November 2023)</p>	<p>As there have been no activities undertaken on the offset sites that are not in compliance with the requirements of the OMPs this item is deemed compliant.</p>	COMPLIANT
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EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
7	The approval holder must notify the department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	Review a dated copy of correspondence provided to the Department confirming date of commencement of the action.	The date of the commencement of action was 21 November 2022. Greater Western Water provided notification of the commencement of action to DCCEEW on 13 December 2022.	Dated email correspondence from S. Campbell to DCCEEW regarding the commencement of action (dated 23/12/2022 1:52pm).	GWW notified DCCEEW of the commencement of action after 16 business days which was outside of the required 10 business days timeframe stipulated in the conditions of the approval.	NON-COMPLIANT
8	The approval holder must maintain accurate and complete compliance records	Review a copy of the approval holder's compliance records.	CH2M Beca Limited undertook monthly site audits from November 2022 until September 2023 for the Melton to Bacchus Marsh Interconnector Pipeline project. The audits assessed all environmental approvals for the project and works including the EPBC Act approval. A report was prepared for each monthly audit and provided to GWW.	Monthly audit reports of the Melton to Bacchus Marsh Interconnector Pipeline project prepared by CH2M Beca Limited, dated November 2022-September 2023.	Monthly audit reports have been provided to GWW which provide complete and accurate records of their compliance with their environmental approval requirements, including the EPBC Act approval.	COMPLIANT
9	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request.	Interview approval holder to confirm whether any Departmental requests have been made for compliance records during audit period. If relevant, obtain and review copies of correspondence with the department.	No requests from the DCCEEW have been received to date.	Interview with S. Campbell held via Microsoft Teams on the 7/2/24.	As the Department has not made any requests for any electronic copies of compliance records, the approval has not been required to supply any records within specific timeframes.	COMPLIANT

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
10	The approval holder must keep the Offset Management Plans published on the website until the end date of this approval.	Review approval holder website to confirm publication of Offset Management Plan(s).	The Mount Gow, Shelford and Hamilton Highway, Cressy Offset Management Plans are both available on the GWW WIN project website page. The OMPs were uploaded on the 16/1/2023.	Published OMPs on the GWW WIN project website page (https://www.gww.com.au/faults-works/upgrades-projects/major-projects/western-irrigation-network-win) Internal GWW email correspondence confirming the publication of the OMPs on the GWW website (dated 16/01/23 2:29pm)	The OMP's are published on the GWW website, as required by the approval.	COMPLIANT
11	The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:	Review a copy of the approval holder's compliance report for the audit period.	GWW has prepared an annual compliance report which includes all conditions of the EPBC Act approval. The report assesses the compliance of actions within Year (21/11/22-21/11/23).	Parwan to Melton Pipeline, Victoria: EPBC 2018/8260 Annual Compliance Report prepared by Greater Western Water (dated 19/2/24)	An annual compliance report has been prepared by the approval holder which includes all the requirements of the EPBC Act approval for the 12 months from the date of commencement of the action. Therefore, this item is deemed as compliant.	COMPLIANT
	a. publish each compliance report on the website within 60 business days following the relevant 12 month period;	Review approval holder website to confirm publication of compliance report.	GWW were required to publish their Annual Compliance Report to their website by the 19/02/24. The Annual Compliance Report was published onto GWW's	Published Annual Compliance Report on the GWW WIN project website page (https://www.gww.com.au/faults-works/upgrades-projects/major-projects/western-irrigation-network-win)	The Annual Compliance Report was published onto the approval holder's website within the specified timeframe and therefore this item is deemed compliant.	COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
		WIN project website page on the 19/02/24.			
b. notify the department by email that a compliance report has been published on the website and provide the weblink for the compliance report within five business days of the date of publication;	Review a copy of correspondence provided to the Department confirming compliance report published on website.	GWW published the Annual Compliance Report to their website on the 19/02/24. On the 19/02/24 GWW notified the Department that the report had been published and provided a link to the GWW website in addition to a PDF copy of the report.	Dated email correspondence from S. Campbell to epbcmonitoring@dcceew.gov.au regarding the commencement of action (dated 19/01/2024 3:33pm).	The approval holder provided notification to the Department of the publishing of the Annual Compliance Report within the required five days of publication and therefore this item is deemed as compliant.	COMPLIANT
c. keep all compliance reports publicly available on the website until this approval expires;	Review approval holder website to confirm publication of compliance report.	The Annual Compliance Report is available on the GWW WIN project website page. The report was published online on the 19/02/24.	Published Annual Compliance Report on the GWW WIN project website page (https://www.gww.com.au/faults-works/upgrades-projects/major-projects/western-irrigation-network-win) Dated email correspondence from S. Campbell to epbcmonitoring@dcceew.gov.au regarding the commencement of action (dated 19/01/2024 3:33pm).	The Annual Compliance Report is published on the GWW website, as required by the approval.	COMPLIANT
d. exclude or redact sensitive ecological data from compliance reports published on the website; and	Review compliance report to confirm if any sensitive ecological data has been excluded or redacted.	The annual compliance report and appendices do not include any sensitive ecological data requiring exclusion or redaction.	Parwan to Melton Pipeline, Victoria: EPBC 2018/8260 Annual Compliance Report prepared by Greater Western Water (dated 19/2/24)	There has not been any sensitive ecological data redacted or excluded from the publicly available annual compliance report and	COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
				therefore this item is deemed compliant.	
e. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the department within 5 business days of publication.	Review a copy of correspondence provided to the Department containing the full compliance report. NB: this review will only occur if sensitive ecological data has been identified as excluded or redacted from published compliance report.	Not applicable	Not applicable	There has not been any sensitive ecological data redacted or excluded from the annual compliance report and therefore no additional information has been provided to the Department.	NOT APPLICABLE
12 The approval holder must notify the department in writing of any: incident; non compliance with the conditions; or non-compliance with the commitments made in the Offset Management Plans. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify:	Undertake a site inspection and interview approval holder to identify whether any incidents or non-compliances have occurred during audit period. If incidents / non-compliances are identified, obtain and review correspondence provided to the Department to determine whether all incidents / non-compliances have been notified within timeframes and with required details.	There are four non-compliances with the EPBC Act approval that required notification to the department. Condition 2 required that all Section 173 Agreements were to be finalised prior to the commencement of the action, however the Section 173 Agreement for the 6060 Hamilton Highway, Cressy was finalised after the date of the commencement of action. Condition 3 required that all offset areas must be secure within 24 months of the EPBC Act approval (dated	Email correspondence from S. Campbell to DCCEEW (dated 13/12/22 1:52pm) Email correspondence from s, Campbell to DCCEEW (dated 22/12/22 12:59pm)	As the Department was not notified of each of the non-compliances with the EPBC Act approval within the specified timeframe this item is deemed non-compliant.	NON-COMPLIANT

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	a. any condition which is or may be in breach;		<p>4/5/21), however the Cressy offset site area does not yet have a registered conservation covenant. Additionally, the covenant for the Mount Gow offset site was registered outside of the specified timeframes.</p> <p>Condition 4 required that GWW notify the department of securing offset areas within 10 business days, however the department was notified outside of the required timeframe. The department was not notified of this non-compliance but are aware as they received the email correspondence regarding the offset sites from GWW.</p> <p>Condition 7 required notification to the Department of the commencement of action within 10 business days, however the department was notified outside the specified timeframe. The department was not notified of this non-compliance but are aware as they received the email correspondence from GWW.</p>			
	b. any condition which is or may be in breach;					
	c. the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.					

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
13	The approval holder must provide to the department the details of any incident or non-compliance with the conditions or commitments made in the Offset Management Plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:	Interview approval holder to identify whether any incidents or non-compliances have occurred during audit period. If incidents / non-compliances are identified, obtain and review correspondence provided to the Department to determine whether all mandatory details have been provided to the Department within required timeframes.	GWW have report that there have been no incidents or non-compliances with the requirements of the OMP have occurred during the audit period.	Interview with S. Campbell from GWW on 7/2/24.	As there have been no incidents of non-compliances with the either of the OMPs there has been no requirement to notify the Department or provide any details.	COMPLIANT
	a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;					
	b. the potential impacts of the incident or non-compliance; and					
	c. the method and timing of any remedial action that will be undertaken by the approval holder.					

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
14	The approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted for the 12 month period starting from the commencement of the action, and that an independent audit of compliance with the conditions of approval is then conducted for each subsequent 12 month period until the completion of the action.	Submission of Audit Report to department by 21 February 2024 NB: this audit is for the 12 month period from 21 November 2022 – 20 November 2023. The submission date of 21 February 2024 is intended to enable auditing of condition 11 which requires the approval holder to complete certain actions within defined timeframes following completion of the 12 month audit period.	Not applicable	Not applicable	The purpose of this audit is to seek compliance with Condition 14.	NOT APPLICABLE
15	For each independent audit, the approval holder must:	Not applicable	Not applicable	Not applicable	The Department was provided with the qualifications and details of the independent auditors as well as the audit criteria within the required timeframes. The independent audit then commenced once this had been approved by the department. The items applicable to the	COMPLIANT
	a. provide the name and qualifications of the proposed independent auditor and the draft audit criteria to the department before the end of the subject 12 month period;	Review a copy of the correspondence provided to the department relating to the auditor's details and audit criteria.	Name and qualifications of proposed auditor sent via email from approval holder to department on 30.8.23.	Email from S. Campbell to audit@dcceew.gov.au dated 30.8.23, 2:24pm.		

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	b. only commence the independent audit once the audit criteria have been approved in writing by the department; and	Review a copy of the correspondence received from the department approving the audit criteria.	GWW issued the audit criteria to be used for the independent audit via email on 29/11/23 and subsequently received a letter from DCCEEW approving the audit criteria. Work on the independent audit did not commence prior to the approval of the audit criteria.	Email from S.Campbell to audit@dcceew.gov.au dated 29/11/23, 3:57pm. Agreement to audit criteria letter from DCCEEW, dated 21/12/23.	assessment of this condition have met the Department's requirements and therefore it is deemed that Condition 15 is compliant.	
	c. submit the audit report to the department within the timeframe specified in the approved audit criteria.	Submission of Audit Report to department by 21 February 2024 NB: this audit is for the 12 month period from 21 November 2022 – 20 November 2023. The submission date of 21 February 2024 is intended to enable auditing of condition 11 which requires the approval holder to complete certain actions within defined timeframes following completion of the 12 month audit period.	Not applicable	Not applicable – to occur following provision of this report to the approval holder.		

EPBC Approval Condition		Verification Method				Termination	Compliance Finding
16	The approval holder must publish the audit report on the website within 10 business days of receiving the department's approval of the audit report and keep the audit report published on the website until the end date of this approval.	No verification proposed – condition 16 requirements will occur following completion of Audit Report.				Not applicable	NOT APPLICABLE
17	Within 20 business days after whichever is the earlier of: a. the completion of the action or b. 60 business days before the end date of the period for which the approval has effect, the approval holder must notify the department in writing of the date of the completion of the action and submit all completion data to the department.	No verification proposed – condition 17 requirements will occur following completion of Audit Report.	Not applicable	Not applicable		Not applicable	NOT APPLICABLE

C

Appendix C – Site Assessment Photographs

Site Assessment

A site visit of the M2BM project was undertaken on 14 February 2024. During the site visit areas Golden Sun Moth habitat and NTGVVP that had been cleared during the works were observed. An assessment of the site identified that clearing of vegetation was in accordance with the requirements EPBC Act approval.







Figure 1: Location of photographs taken


Location	Site photo
1	

Location	Site photo
2a	

Location	Site photo
2b	
3	
4	

Location	Site photo
5	
6	
7	

Location	Site photo
8a	

Location	Site photo
8b	
9	