Jacobs Becahunterh₂O

Parwan to Melton Pipeline, Victoria

EBPC Act Independent Audit (EPBC Approval 2018/8260)

Prepared for Greater Western Water Prepared by Jacobs Beca HunterH2O 20 March 2025



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Revision History

Revision N ^o	Prepared By	Description	Date
A	Fran Soler	Independent audit report - Draft	12.03.25
В	Fran Soler	Independent audit report - Final	20.03.25

Document Acceptance

Action	Name	Signed	Date
Prepared by	Fran Soler	for the second s	20.03.25
Reviewed by	Melody Valentine	Mt Vleit	20.03.25
Approved by	Melody Valentine	Mt Vleit	20.03.25
on behalf of	Jacobs Beca HunterH2O		

Acknowledgement of Country

Jacobs Beca HunterH2O proudly acknowledges Aboriginal and Torres Strait Islander peoples as the Traditional Owners of the lands upon which each office located and those upon which we operate. We recognise that Traditional Owners have cared for and protected these lands for thousands of generations. Traditional Owners always have and always will have strong cultural, social and spiritual connections to the lands, skies and waters. Jacobs Beca HunterH2O respectfully recognises the Ancestors and Elders, past, present and future. We acknowledge that sovereignty was never ceded and we are committed to working towards reconciliation.

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 second audit which considers the period 21 November 2023 to 21 November 2024.

The audit assessed a total of 39 compliance requirements from the EPBC Act Approval and Offset Management Plans (OMPs). A total of five (5) non-compliances were identified, resulting in a compliance rate of 84.4%. A summary of the non-compliances are as follows:

- EPBC Act Approval Condition 12 There were two non-compliances with the OMP that DCCEEW were
 not notified of within the required 2 business days. It is recommended that project staff make note of
 reporting timeframe requirements for all future events.
- EPBC Act Approval Condition 13 There were two non-compliances with the OMP that DCCEEW were
 not provided further information of within the required 10 business days. It is recommended that project
 staff make note of reporting timeframe requirements for all future events.
- EPBC Act Approval Condition 16 The independent audit report was not published on the GWW project website after receiving the approval letter from DCCEEW. It is recommended that project staff make note of timeframe requirements for all future audit reports.
- 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 and for each subsequent 12 month period until the completion of the action. This report details the findings of the second required independent audits for the Parwan to Melton Pipeline project.

It is noted that no construction works were undertaken between October 2023 and November 2024. During this time there were cultural heritage salvage works occurring within the vicinity of the Werribee River. There are no identified EPBS species or communities located within or in the immediate vicinity of the salvage area.

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
 - Experience: Over 5 years' experience in the environmental planning and providing support roles to over 15 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.

Item	
Dates when and locations where the audit was conducted	An interview of the project manager (Stephen Campbell) was undertaken on 6 March 2025. A site visit of the M2BM project was undertaken on 6 March 2025.
Methods	
Methous	 Review of current and historical spatial mapping Review of supporting evidence – documents and records
	On-site assessment of areas of vegetation removal
Evidence reviewed	 Interview with approval holder Email correspondence from S. Campbell to DCCEW (dated 22/12/22
Evidence reviewed	12:59pm)
	Email correspondence from S. Campbell to DCCEEW (dated 13.12.22 1:52pm)
	• Email correspondence to DCCEEW and TfN from S. Campbell with the vegetation assessment report and the landowner report (dated 8.01.25).
	• Dated email correspondence from S. Campbell to DCCEEW regarding the commencement of action (dated 23/12/2022 1:52pm).
	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)
	Register Search Statement - for 6060 Hamilton Highway, Cressy (Volume 11971 Folio 512)
	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)
	 Year 2 (2023/24) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated December 2024)
	185 Mount Gow Road, Shelford Landowner Report, prepared by Charlie Cameron (dated 30.05.24)
	Chathams Farm - 6060 Hamilton Highway, Cressy Landowner Report (Year 2 / November 2023- November 2024) prepared by Warrambeen Offset Management (dated September 2024)
	• Monthly audit reports of the Melton to Bacchus Marsh Interconnector Pipeline project prepared by Jacobs Beca HunterH2O (previously CH2M Beca Limited), dated November 2022- September 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)
	 Parwan to Melton Pipeline, Victoria: EPBC 2018/8260 Annual Compliance Report prepared by Greater Western Water (dated 18.02.25)
	 Parwan to Melton Pipeline, Victoria EBPC Act Independent Audit (EPBC Approval 2018/8260), preapred by CH2M Beca (Dated 20.02.24)

Item	
	 Email from S. Campbell to Chris.Kerin@dcceew.gov.au dated 16.12.24, 4:04pm.
	 Email from S. Campbell to Chris.Kerin@dcceew.gov.au dated 15.01.25, 3:26pm.
	Letter from DCCEEW to S. Campbell dated 6.06.24.
	• Agreement to audit criteria letter from DCCEEW, dated 20.01.25.

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 noncompliance with a condition or element of a condition.

2.2 Compliance Findings

2.2.1 EPBC Act Approval Conditions

Compliant	Non-Compliant	Not Applicable
10	3	4

2.2.2 OMP Requirements

Compliant	Non-Compliant	Not Applicable
17	2	3

A total of 39 compliance requirements were reviewed during the audit. Out of the total applicable items there were five (5) non-compliances identified, providing a compliance rate of 84.4%.

The audit identified that most of the non-compliances related to not completing actions within specified timeframes, including notification to DCCEEW and submission of the annual landowner report.

Condition	Non-Compliance Description	Recommended Action
12	There were two (2) non-compliances relating to breaches of the incident notification timeframes.	Project staff should be informed of the requirement that DCCEEW 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.
13	There were two (2) non-compliances relating to breaches of the incident notification timeframes required by the OMP.	Project staff should be informed of the requirement that DCCEEW be provided the details of any future incidents or non- compliances with the EPBC Act approval or OMPs within the required 10 business days after becoming aware of the incident or non-compliance.

Condition	Non-Compliance Description	Recommended Action
16	The independent audit report was not published on the GWW project website after receiving the approval letter from DCCEEW.	Project staff should be informed of the requirement that future audit reports are required to be published on the website within 10 business days after receiving approval from DCCEEW.
Mount Gow OMP – Annual report submission	The annual landowner report was not submitted within the required timeframe.	Project staff should be informed of the requirement that future annual reports should be submitted within the required timeframe or an extension should be sought as early as possible.
Hamilton Highway OMP – Annual report submission	The annual landowner report was not submitted within the required timeframe.	Project staff should be informed of the requirement that future annual reports should be submitted within the required timeframe or an extension should be sought as early as possible.

Refer to Appendix B for a detailed compliance assessment.

2.3 Opportunities for Improvement

Similar to the Year 1 audit, the non-compliances related to not completing actions within specified timeframes. It is recommended that GWW project staff are informed of the timeframes and procedures are established to track timeframes as they are triggered.

Although the objectives of the OMPs are intended 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 identified that there has been an overall increase of environmental weeds with a decrease of native vegetation condition and extent within the offset site. The report has provided recommendations including spot spraying, an ecological burn and engagement of a land management contractor to manage environmental weeds. It is recommended that these actions are adopted.

While it is not currently deemed a reportable item, should the concerning trajectory of the native vegetation on the offset site continue it would be considered a reportable incident.

2.4 Strengths

While there had been no construction work undertaken during the audit period, GWW demonstrated awareness of the areas of habitat that requires protection and an understanding of the required methods for achieving protection.

Appendix A. Auditors' Certification

Appendix A—Auditor's Declaration of Independence

I, [name of auditor¹] Melody Valentine of [name of organisation and full address] CH2M Beca Limited, Level 23 695 Collins Street Docklands VIC

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 <u>has not</u> 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.

In making this declaration, I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (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. An extract of section 491 of the EPBC Act is attached

Si	σn	ed
J	gп	cu

Full name (please print)	Melody Valentine
Organisation (please print)	CH2M Beca Limited

Date

15 / 01 / 2025

Footnote:

- 1. Where an organisation or a team of auditors is nominated to undertake the audit, each individual that is nominated is to complete a separate declaration.
- 2. The curriculum vitaes of all audit team members are to be submitted with the declaration outlining their relevant experience and qualifications.

Appendix C—Audit Report— Auditor's Certification

Melody Valentine, Lead Auditor, CH2M Beca Auditor's name, position, company and contact details: melody.valentine@beca.com

Auditor's qualifications and/or experience:

Auditor's declaration:

Bachelor of Resource & Environmental Planning (Hons.) Lead Auditor: Environmental Management Systems (20256) Over 15 years of environmental assessment and 10 years of environmental auditing experience

• 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.

del Signature: //

Date: 20 March 2025

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 auditor¹] Francesca Soler of [name of organisation] of [name of organisatio] of [name of organisatio] of [name of organisation] of [na

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.

In making this declaration, I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (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. An extract of section 491 of the EPBC Act is attached

Signed	A A A	
Full name (please print)	Francesca Soler	
Organisation (please print)	CH2M Beca Limited	
-	45 - 04 - 0005	

Date

<u>15 / 01 / 2025</u>

Footnote:

- 1. Where an organisation or a team of auditors is nominated to undertake the audit, each individual that is nominated is to complete a separate declaration.
- 2. The curriculum vitaes of all audit team members are to be submitted with the declaration outlining their relevant experience and qualifications.

Appendix C—Audit Report— Auditor's Certification

Auditor's name, position, company and contact details: Francesca Soler, Support Auditor, CH2M Beca fran.soler@beca.com

Auditor's qualifications and/or experience: Bachelor of Environments, Master of Urban Planning Over 5 years' experience in environmental planning and providing support roles to over 15 audits.

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:

Date: 20 March 2025

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 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 March 2025 REPORT PREPARED BY: Melody Valentine/Francesca Soler REPORT APPROVED BY: Stephen Campbell

EPBC Ap	pproval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
the not a. 1 Gol	hin the project area, approval holder must clear more than: 0.459 hectares of den Sun Moth habitat. 1.961 ha of NTGVVP	Undertake a site inspection to see that no unauthorised clearance has occurred. Site visit to be photographically documented. Review any available spatial records from construction vehicles. Review compliance report.	GWW reported that there were no construction works conducted during the audit period and therefore there had been no unapproved clearance of Golden Sun Moth habitat of NTGVVP. A site visit was conducted on 6.03.25 which confirmed that any previous vegetation removal had been in accordance with the requirements of the EPBC Act approval. A review of historical and current spatial mapping of the project area demonstrated that no works occured within the audit period and that no additional clearing had occurred.	Interview with S. Campbell from GWW on 6.03.25. Site visit on 6.03.25. Review of spatial mapping of the site (NearMap).	The documents sighted supported reports that there had been no construction works undertaken during the audit period there was no additional clearing of any Golden Sun Moth habitat or NTGVVP. As the previous amounts of vegetation clearance were below the EPBC Act approval thresholds this item is deemed compliant.	COMPLIANT

						Compliance Evaluatio
EPI	3C 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</i> <i>Environment Act</i> <i>1987</i> (Vic). The Section 173 Agreement must not be removed unless the site is secured.	Review a copy of signed Section 173 agreement.	As per the Year 1 audit, GWW advised DCCEEW that the date of commencement of action was 21/11/22. The Section 173 Agreement between Golden Plains Shire Council, Crichton Properties Pty Ltd, and Western Region Water Corporation, dated 29 June 2021, specifies that the owner has agreed to the land being used as an offset for the loss of 5.26 hectares of Golden Sun Moth Habitat. The Section 173 Agreement between Colac Otway Shire Council, RD Griffiths Trading Pty Ltd, and Greater Western Water Corporation, dated 30 November 2022, states that the owner has agreed to the land being used as an offset for the loss of 5.2 hectares of Golden Sun Moth Habitat and 4.961 hectares of NTGVVP.	Email correspondence from S. Campbell to DCCEW (dated 22/12/22 12:59pm) Mount Gow, Shelford Section 173 Agreement 6060 Hamilton Highway, Cressy Section 173 Agreement	As assessed in the Year 1 audit, the Section 173 Agreements were not finalised prior to the commencement of the action and this condition was determined to be non-compliant. This issue is not considered an on-going non- compliance as it was discharged in the previous audit period. The Section 173 agreements remain in place, therefore this item is deemed compliant.	COMPLIANT
3	Within 24 months of this approval the offset areas must be secured.	Review Certificate of Title to confirm a conservation covenant is	As per the Year 1 audit, the covenant for the Mount Gow, Shelford offset is registered on the title, dated 20.06.23.	Register Search Statement – for Mount Gow Shelford offset site (Volume 9575 Folio 544) Register Search Statement - for	In the Year 1 Audit (2022/23) this condition was deemed non- compliant due to not meeting the required	NOT APPLICABLE

Comp						Compliance Evaluatio
EPE	C Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
		registered on the applicable title(s).	The covenant for the 6060 Hamilton Highway, Creey offset is registered on the title, dated 18.04.24.	6060 Hamilton Highway, Cressy (Volume 11971 Folio 512)	timeframes, however evidence was sighted to confirm the sites had been secured. As this condition was discharged during the previous audit period, it is deemed not applicable for this audit period.	
4	Within 10 business days of each offset area being secured, the approval holder must provide the department with: written evidence demonstrating that all the offset area has been secured; and shapefiles and the offset attributes for the offset area.	Review a dated copy of the correspondence provided to the Department containing written evidence, shapefiles and offset attributes.	As per the Year 1 Audit, 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).	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)	In the Year 1 Audit (2022/23) this condition was deemed non- compliant due to not meeting the required timeframes, however evidence was sighted to confirm the requirements had ultimately been met. As this condition was discharged during the previous audit period it is deemed not applicable for this audit period.	NOT APPLICABLE
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	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)	Audit 1 found that both OMPs were prepared and implemented prior to the commencement of the action. This audit found that the OMPs are still being actively implemented and therefore GWW is	COMPLIANT

Compliance					
EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
each offset area for the duration of the approval.				compliant with this requirement.	
Mount Gow OMP:					
Maintenance and protection of the offset site will be achieved by: 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 October to 31st January; Controlling pest animals, particularly rabbits and foxes; and Managing native species understorey diversity and recruitment.	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 2 (2023/24) monitoring of Mount Gow, Shelford, Victoria (dated December 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 is dated May 2024.	Year 2 (2023/24) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated December 2024)	The Year 2 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
Maintain fencing in good condition around entire boundary of all sites	Review the monitoring report undertaken by an	The site assessment identified that the fencing on site was maintained in good	Year 2 (2023/24) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by	The Year 2 monitoring report for the Mount Gow, Shelford site	COMPLIANT

BC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
where fencing exists or is required.	independent party to confirm adequate fencing is in place	condition and there were no fence gaps identified. The fencing remained stock- proof and met the requirements of the OMP.	Ecology & Heritage Partners (dated December 2024)	identified that the fencing around the offset was in good condition and had been maintained appropriately and therefore this item is deemed 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 have identified that fencing adequately excluded stock during the October- November exclusiong period.	Year 2 (2023/24) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated December 2024) 185 Mount Gow Road, shelford Landowner Report, prepared by Charlie Cameron (dated 30.05.24)	The Year 2 monitoring report and landowner report for the Mount Gow, Shelford site did not report any new fencing, however all fencing was able to adequately exclude stock during the exclusion period. The assessment report identified that all fencing requirements had been met and therefore this item is deemed compliant.	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 assessment report and landowner report have both identified that Year 2 targets for posts around the offset site perimeter had been met.	Year 2 (2023/24) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated December 2024) 185 Mount Gow Road, shelford Landowner Report, prepared by Charlie Cameron (dated 30.05.24)	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	In Year 2 monitoring all woody weeds were	Year 2 (2023/24) Mount Gow, Shelford, Victoria Vegetation	The Year 2 monitoring report for the Mount	COMPLIANT

Compliance Evaluation

					Compliance Evaluation
EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	undertaken by an independent party to confirm weed control is adequate.	appropriately managed on the offset site with a reduction to <1% cover.	Assessment Report prepared by Ecology & Heritage Partners (dated December 2024)	Gow, Shelford site identified that all woody weeds had been managed in line with the requirements of the OMP.	
Control all herbaceous weeds.	Review the monitoring report undertaken by an independent party to confirm weed control is adequate.	The assessment report notes tat since the implementation of the OMP the cover of native grasses and herbaceous plans has considertably decreased as a result of the presence of Toowoomba Canary Grass Phalaris aquatica, spreading across much of the offset site.The assessment report has identified that herbaceous weeds were controlled in accordance with the requirements of the OMP, however current methods to manage herbaceous weeds were inadequate due to the increase in total weed cover. Intensive active management will be required to ensure that the percentage of cover meets the requirements of the OMP.	Year 2 (2023/24) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated December 2024)	The Year 2 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 had still been undertaken as per the requirements of the OMP and therefore this item is deemed compliant.	COMPLIANT

3C Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Eliminate all new & emerging herbaceous weeds.	Review the monitoring report undertaken by an independent party to confirm weed control is adequate.	The assessment report notes that since the implementation of the OMP the cover of native grasses and herbaceous plans has considertably decreased as a result of the presence of Toowoomba Canary Grass Phalaris aquatica, spreading across much of the offset site. Ongoing active management will be required to ensure that the percentage of cover meets the requirements of the OMP.	Year 2 (2023/24) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated December 2024)	The Year 2 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 confirm pest control is adequate.	The landowner report noted that monthly shootings of rabbits and foxes was undertaken with remains discarded. Regular monitoring of animal populations was being undertaken and no new threats identified. During the site assessment one rabbit warren was identified approximately 700m south of the Golden Sun moth offset area. As per the OMP the rabbit warren must be controlled immediately.	Year 2 (2023/24) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated December 2024) 185 Mount Gow Road, shelford Landowner Report, prepared by Charlie Cameron (dated 30.05.24)	The Year 2 monitoring report for the Mount Gow, Shelford 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.	COMPLIANT

EPBC Approval Condition	Verification	Evidence	Documents Sighted	Determination	Compliance Evaluat
	Method				Finding
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 2 (2023/24) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated December 2024) 185 Mount Gow Road, Shelford Landowner Report, prepared by Charlie Cameron (dated 30.05.24)	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: Annual report is signed, dated and submitted by the Landowner at least 2 months prior to the anniversary date of ontitle agreement registration. 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 	Sight a copy of the final annual report and correspondence confirming its submission to TfN and DAWE. Confirm that these requirements have been met.	The 2023/24 land owner report for the 185 Mount Gow Road, Shelford offsite has been prepared (dated 30.05.24). The report records management actions undertaken in accordance with the OMP and photographic evidence of these actions. GWW provided the vegetation assessment and landowner report to the Department and TfN on 8.01.25.	185 Mount Gow Road, Shelford Landowner Report, prepared by Charlie Cameron (dated 30.05.24) Email correspondence to DCCEEW and TfN from S. Campbell with the vegetation assessment report and the landowner report (dated 8.01.25).	The landowner report details the management activities that have been completed through comments and photographic evidence, as per the requirements of the OMP. The 2023/24 landowner report was provided to DCCEEW and TfN as per the OMP requirements. However, the Section 173 registration is dated 22.07.21 requiring submission of the reports by the 22.5 annually. As the landowner report is dated 30.05.24 it is considered that the provision of the report was not undertaken within the required	NON- COMPLIANT

Compliance	Evaluation
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					Compliance Evaluation	
PBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding	
 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 been met and the obligations form is signed, dated and submitted with the annual report. 				timeframe, resulting in a non-compliance.		
Review effectiveness of OMP: 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: Stock-proof fencing around the boundary of the offset site and low impact fencing dividing the site into smaller more manageable paddocks;	Review the monitoring report undertaken by an independent party to confirm all of these controls are in place.	As per the 6060 Hamilton Highway, Cressy OMP a Year 2 detailed monitoring report is not required. The Year 2 landowner report provides updates and photographs of the offset site. Measures including fencing, weed control, biomass control and pest	6060 Hamilton Highway, Cressy OMP prepared by Ecology & Heritage Partners (dated May 2023) Chathams Farm - 6060 Hamilton Highway, Cressy Landowner Report (Year 2 / November 2023- November 2024) prepared by Warrambeen Offset Management (dated September 2024)	The Year 2 landowner report for the 6060 Hamilton Highway, Cressy offset site provides updates on actions that have been undertaken as per the requirements of the OMP. The landowner report has provided updates on all	COMPLIANT	

	Compli					
EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding	
Weed control through active management; 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.		animal control are included in the report.		management actions required by the OMP for the maintenance and protection of the offset site completed in Year 2 and therefore this item is deemed compliant.		
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. The fencing remains in excellent stock proof condition. Images of the fencing has been provided.	Chathams Farm - 6060 Hamilton Highway, Cressy Landowner Report (Year 2 / November 2023- November 2024) prepared by Warrambeen Offset Management (dated September 2024)	The Year 2 landowner report for the 6060 Hamilton Highway, Cressy has identified that the boundary fencing remains stock proof and in good condition 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	The fencing remains in excellent stock proof condition. Images of the fencing has been provided.	Chathams Farm - 6060 Hamilton Highway, Cressy Landowner Report (Year 2 / November 2023- November 2024) prepared by Warrambeen Offset Management (dated September 2024)	The Year 2 landowner report for the 6060 Hamilton Highway, Cressy has identified that the boundary fencing remains stock proof and in good condition as per the requirements of the OMP	COMPLIANT	

EPBC Approval Condition	Verification	Evidence	Documents Sighted	Determination	Compliance Evaluatio
Control new and emerging woody weeds.	Method 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 the includes weeds targeted.	Chathams Farm - 6060 Hamilton Highway, Cressy Landowner Report (Year 2 / November 2023- November 2024) prepared by Warrambeen Offset Management (dated September 2024)	The Year 2 landowner report for the 6060 Hamilton Highway, Cressy identified ongoing weed control management actions had been undertaken on the site and therefore this item is deemed compliant.	Finding COMPLIANT
Control herbaceous 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 the includes weeds targeted. It is noted that as a Year 2 monitoring report was not required as per the OMP, the percentage of weed cover reduction has not been confirmed.	Chathams Farm - 6060 Hamilton Highway, Cressy Landowner Report (Year 2 / November 2023- November 2024) prepared by Warrambeen Offset Management (dated September 2024) 6060 Hamilton Highway, Cressy OMP prepared by Ecology & Heritage Partners (dated May 2023)	The Year 2 landowner report for the 6060 Hamilton Highway, Cressy 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.	The landowner report did not identify any major weed cover issues and weed control measures are being undertaken on a regular basis. The landowner has prepared a weed control log and the includes weeds targeted.	Chathams Farm - 6060 Hamilton Highway, Cressy Landowner Report (Year 2 / November 2023- November 2024) prepared by Warrambeen Offset Management (dated September 2024)	The Year 2 landowner report for the 6060 Hamilton Highway, Cressy identified ongoing weed control management actions had been undertaken on the site and therefore this item is deemed compliant.	COMPLIANT

C Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Monitor and control rabbits and foxes.	Review the monitoring report undertaken by an independent party to confirm pest control is adequate.	The Year 2 land owner report identifies that regular monitoring of pests is being undertaken on the offset site. The report includes a pest control activity log.	Chathams Farm - 6060 Hamilton Highway, Cressy Landowner Report (Year 2 / November 2023- November 2024) prepared by Warrambeen Offset Management (dated September 2024)	The Year 2 landowner report for the 6060 Hamilton Highway, Cressy identified ongoing pest control management actions had been undertaken on the site and therefore this item is deemed compliant.	COMPLIANT
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.	Chathams Farm - 6060 Hamilton Highway, Cressy Landowner Report (Year 2 / November 2023- November 2024) prepared by Warrambeen Offset Management (dated September 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
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.	As per the 6060 Hamilton Highway, Cressy OMP a Year 2 detailed monitoring report is not required. The Year 2 landowner report does not provide any updates regarding the monitoring of organic litter on the offset site and therefore this item is unable to be assessed.	Chathams Farm - 6060 Hamilton Highway, Cressy Landowner Report (Year 2 / November 2023- November 2024) prepared by Warrambeen Offset Management (dated September 2024) 6060 Hamilton Highway, Cressy OMP prepared by Ecology & Heritage Partners (dated May 2023)	Not applicable	NOT APPLICABLE
Prepare and submit an annual report and photo monitoring to TfN and Approval Holder:	Sight a copy of the final annual report and correspondence confirming its submission to TfN	The Year 2 landowner report for the 6060 Hamilton Highway, Cressy offsite has been prepared (dated September 2024). The	Chathams Farm - 6060 Hamilton Highway, Cressy Landowner Report (Year 2 / November 2023- November 2024) prepared by Warrambeen Offset Management	The landowner report details the management activities that have been completed through comments and	NON- COMPLIANT

BC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Report provides enough	and DAWE. Confirm	report records management	(dated September 2024)	photographic evidence,	
detail in the form of	that these	actions undertaken in		as per the requirements	
written comments and	requirements have	accordance with the OMP	Email correspondence to	of the OMP. The Year 2	
supporting evidence that	been met.	and photographic evidence	DCCEEW and TfN from S.	landowner report was	
an assessor can easily		of these actions.	Campbell with the vegetation	provided to DCCEEW	
determine the completion			assessment report and the	and TfN as per the OMP	
of / progress against the		GWW provided the	landowner report (dated 8.01.25).	requirements.	
commitments for the		vegetation assessment and			
offset site. Report will also		landowner report to the		The Section 173	
include photos that are		Department and TfN on		registration is dated	
reviewed by a qualified		8.01.25.		30.11.22 requiring	
ecologist.				submission of the reports	
Allow for ongoing				by the 30.09 annually. As	
assessment of the				the landowner report was	
effectiveness of				provided to DCCEEW	
management. Reports will				and TfN on 8.01.25 it is	
include a review of past				considered that the	
management works				provision of the report	
against the performance				was not undertaken	
targets and objectives				within the required	
contained within this				timeframe resulting in a	
OMP. Future				non-compliance.	
management priorities will					
also be detailed in these					
reports.					
Obligations of the					
landowner have been met					
and the obligations form is					
signed, dated and					
submitted with the annual					
report.					

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Review effectiveness of OMP: 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
 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. 	Review a copy of the latest annual monitoring report and photographs required under the Offset Management Plan(s).	As per the 6060 Hamilton Highway, Cressy OMP a Year 2 detailed monitoring report is not required. The 2023/24 monitoring report for the Mount Gow, Shelford offsert site and details all required management actions as per the OMP and assess actions that have been undertaken on each site over the past year. Neither landowner reports for both offset sites or the Mount Gow, Shelford monitoring report have identified any activities that were not previously included within the approved OMPs.	6060 Hamilton Highway, Cressy OMP prepared by Ecology & Heritage Partners (dated May 2023) Year 2 (2023/24) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated December 2024) Chathams Farm - 6060 Hamilton Highway, Cressy Landowner Report (Year 2 / November 2023- November 2024) prepared by Warrambeen Offset Management (dated September 2024) 185 Mount Gow Road, Shelford Landowner Report, prepared by Charlie Cameron (dated 30.05.24)	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.	COMPLIANT

EPE	BC 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.	As per the Year 1 audit, 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).	As per the Year 1 audit (2022/23) this condition was deemed non- compliant. However, no further actions are required in relation to this condition and therefore it is deemed that the requirements are not applicable for this audit period.	NOT APPLICABLE
8	The approval holder must maintain accurate and complete compliance records	Review a copy of the approval holder's compliance records.	There were no construction works that occurred within the audit period and therefore the monthly independent audits undertaken by Jacobs Beca HunterH2O (previously CH2M Beca Limited) were put on hold. Previously audits had been conducted from the start of works 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.	Review of spatial mapping of the site (NearMap). Interview with S. Campbell from GWW on 6.03.25. Site visit on 6.03.25.	While there were no audits conducted during the audit period monthly audit reports have been previously provided to GWW which provide complete and accurate records of their compliance with their environmental approval requirements, including the EPBC Act approval. A review of spatial data and the site visit confirmed that no works had occurred during the audit period.	COMPLIANT

Compliance Evaluat						
EPE	BC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
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 on site on the 6.03.25.	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
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 still currently available on the GWW WIN project website page. The OMPs were originally uploaded to GWW's website on the 16.01.2023.	Published OMPs on the GWW WIN project website page (https://www.gww.com.au/faults- works/upgrades-projects/major- projects/western-irrigation- network-win)	The OMPs have been published to the GWW website and remain available for access, 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 (21/11/23-21/11/24).	Parwan to Melton Pipeline, Victoria: EPBC 2018/8260 Annual Compliance Report prepared by Greater Western Water (dated 18.02.25)	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

C Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
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 19.02.25. The Annual Compliance Report was published onto GWW's WIN project website page on the 19.02.25	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 19.01.25 1:52pm).	The Annual Compliance Report was published onto the approval holder's website within the specified timeframe and therefore this item is deemed compliant.	COMPLIANT
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 19.02.25. On the 9.02.25 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 19.01.25 1:52pm).	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 19.02.25.	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	The Annual Compliance Report is published on the GWW website, as required by the approval.	COMPLIANT

3C Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
			regarding the commencement of action (dated 19.01.25 1:52pm).		
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 18.02.25)	There has not been any sensitive ecological data redacted or excluded from the publicly available annual compliance report and 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
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	Undertake a site inspection and interview approval holder to identify whether any incidents or non- compliances have	In the Year 1 audit four non- compliances with the EPBC Act approval were identified and required notification to the department. Non- compliances were identified against Conditions 2, 3, 4 and 7. The Department	Parwan to Melton Pipeline, Victoria EBPC Act Independent Audit (EPBC Approval 2018/8260), prepared by CH2M Beca (Dated 20.02.24) Email correspondence to	The non-compliances with the EPBC Act approval identified in Year 1 no longer require any further action and there have been no additional non- compliances requiring	NON- COMPLIANT

					Compliance Evaluation
EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
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:	occurred during audit period. If incidents / non- compliances are identified, obtain and review correspondence provided to the	were made aware of these non-compliances with teh submission of the Year 1 independent audit, No further action is required regarding these non- compliances.	DCCEEW and TfN from S. Campbell with the vegetation assessment report and the landowner report (dated 8.01.25).	notification to the Department. As the Department was not notified of each of the non-compliances with the requirements of the OMPs this item is	
a. any condition which is or may be in breach;	Department to determine whether	Non-compliances with both OMPs have been identified		deemed non-compliant.	
b. any condition which is or may be in breach;	all incidents / non- compliances have been notified within timeframes and with required details.	regarding the submission of the annual report to DCCEEW and TfN within 2			
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.		months of the anniversary dates of the execution of both their respective agreements. Both were deemed non-compliant with these conditions of the OMPs and the Department has not yet been notified.			
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	Non-compliances with both OMPs have been identified regarding the submission of the annual report to DCCEEW and TfN within 2 months of the anniversary dates of the execution of both their respective agreements. Both were deemed non-compliant with these conditions of the OMPs and the Department has not yet been notified or	Email correspondence to DCCEEW and TfN from S. Campbell with the vegetation assessment report and the landowner report (dated 8.01.25).	As the Department was not notified of each of the non-compliances with the requirements of the OMPs or provided any further information this item is deemed non- compliant.	NON- COMPLIANT

PBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
 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. 	Department to determine whether all mandatory details have been provided to the Department within required timeframes.	provided details of the non- compliances.			
4 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 2025 NB: this audit is for the 12 month period from 21 November 2023 – 20 November 2024. The submission date of 11 April 2025 is in accordance with the approval letter received from the Department on 20.01.25. This timeframe is intended to enable	A Year 1 Independent Audit was prepared by CH2M Beca to assess the compliance of the Parwan to Melton Pipeline, Victoria against EPBC Approval 2018/8260 for the 12-month period from 21 November 2022- 20 November 2023. The audit was subsequently provided to the Department on 21 February 2024.	Dated email correspondence from S. Campbell to epbcmonitoring@dcceew.gov.au regarding the commencement of action (dated 21.02.25 12:18pm). Parwan to Melton Pipeline, Victoria EBPC Act Independent Audit (EPBC Approval 2018/8260), prepared by CH2M Beca (Dated 20.02.24)	An independent audit was conducted for the 12-month period from 21 November 2022- 20 November 2023 and assessed the project's compliance with the condition of the approval and therefore this item is deemed compliant.	COMPLIANT

EPB(C Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
		11 which requires the approval holder to complete certain actions within defined timeframes following completion of the 12 month audit period.				
15	For each independent audit, the approval holder must:	Not applicable	Not applicable	Not applicable		
	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 the approval holder to the Department on 16.12.24. The Department requested updates on 14.01.25 and the approval holder sent through required updates on 15.01.25.	Email from S. Campbell to Chris.Kerin@dcceew.gov.au dated 16.12.24, 4:04pm. Email from S. Campbell to Chris.Kerin@dcceew.gov.au dated 15.01.25, 3:26pm.	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 assessment of this	COMPLIANT
	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.	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 16.12.24. The Department requested updates on 14.01.25 and the approval holder sent through required updates on 15.01.25. An approval letter was received from the Department on 20.01.25.		
	c. submit the audit report to the department within the timeframe specified in	Submission of Audit Report to	Submission of Audit Report to department by 21 February 2025	Not applicable. NB: The approval letter received		

				·	Compliance Evaluatio	
EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding	
the approved audit criteria.	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.		from the Department on 20.01.25 noted that the independent audit report was due no later than 11.04.25.			
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.	Review a copy of the correspondence received from the department approving the audit report. Review approval holder website to confirm publication of audit report.	DCCEEW issued a letter to GWW on 6 June 2024 advising that the Year 1 (2022/23) independent audit report had been approved. The independent audit report was not published on the website after receiving the approval letter.	Letter from DCCEEW to S. Campbell dated 6.06.24. GWW WIN project website page (https://www.gww.com.au/faults- works/upgrades-projects/major- projects/western-irrigation- network-win)	As the independent audit report was not published on the website within the required timeframe this item is non-compliant.	NON- COMPLIANT	

						Compliance Evaluation
EPE	C Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
17	Within 20 business days after whichever is the earlier of:	he proposed – condition 17 requirements will occur following completion of Audit Report. f the nust in the on etion	Not applicable	Not applicable	Not applicable	NOT APPLICABLE
	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.					

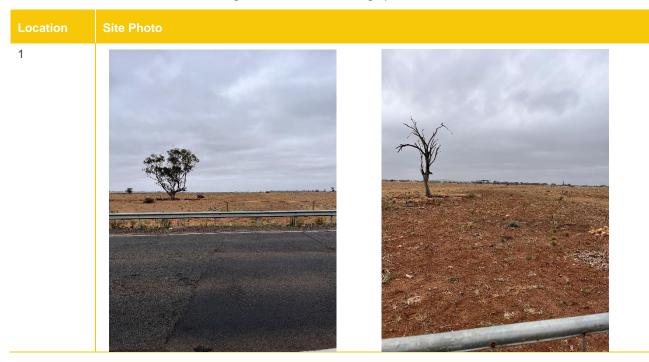
Appendix C. Site Assessment Photographs

Site Assessment

A site visit of the M2BM project was undertaken on 6 March 2024. There were no works or vegetation clearance that occurred during the audit period. During the site visit areas Golden Sun Moth habitat and NTGVVP were observed to confirm that no additional clearance had been undertaken. 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



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