

## Parwan to Melton Pipeline, Victoria – Year 3

EBPC Act Independent Audit (EPBC Approval 2018/8260)

Prepared for Greater Western Water

Prepared by Jacobs Beca HunterH2O

13 February 2026



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## Revision History

Revision N°	Prepared By	Description	Date
A	Fran Soler	Independent audit report - Draft	16.01.26
B	Fran Soler	Independent audit report - Final	20.01.26
C	Fran Soler	Independent audit report – Updated as per DCCEEW comments	13.02.26

## Document Acceptance

Action	Name	Signed	Date
Prepared by	Fran Soler		13.02.26
Reviewed by	Melody Valentine		13.02.26
Approved by	Melody Valentine		13.02.26
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

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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 2024 to 21 November 2025.

The audit assessed a total of 39 compliance requirements from the EPBC Act Approval and Offset Management Plans (OMPs). A total of two (2) non-compliances were identified, resulting in a compliance rate of 94.87%. A summary of the non-compliances are as follows:

- EPBC Act Approval Condition 12 – DCCEEW were not notified of the non-compliance identified with the 6060 Hamilton Highway, Cressy OMP within the required 2 business days. It is recommended that project staff make note of reporting timeframe requirements for all future events.
- 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, and more actively manage third parties who influence the fulfillment of these items.

# 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 an EPBC Act approval (EPBC 2018/8260) relating to the M2BM component of the scheme. 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 audit 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 EPBC 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	<p>An interview of the project manager (Stephen Campbell) was undertaken on 18 December 2025.</p> <p>A site visit of the M2BM project was undertaken on 18 December 2025.</p>
Methods	<ul style="list-style-type: none"> <li>• Review of current and historical aerial photography</li> <li>• Review of supporting evidence – documents and records</li> <li>• On-site assessment of areas of vegetation removal</li> <li>• Interview with approval holder</li> </ul>
Evidence reviewed	<ul style="list-style-type: none"> <li>• Email correspondence from S. Campbell to DCCEW (dated 22.12.22 12:59pm)</li> <li>• Email correspondence from S. Campbell to DCCEEW (dated 13.12.22 1:52pm)</li> <li>• Email correspondence to DCCEEW and TfN from S. Campbell with the landowner report (dated 06.05.25).</li> <li>• Email correspondence from S. Campbell to DCCEEW relating to the submission of the 6060 Hamilton Highway, Cressy OMP assessment and landowner report (dated 01.10.25 2:27pm)</li> <li>• Email correspondence from S. Campbell to epbmonitoring@dceew.gov.au regarding the publication of the compliance report of GWW's website page (dated 06.01.26).</li> <li>• Email correspondence from S. Campbell to DCCEEW regarding non-conformances relating to the 6060 Hamilton Highway, Cressy OMP landowner report (dated 06.10.25 3:21pm)</li> <li>• Email correspondence from S. Campbell to DCCEEW regarding the Year 2 Independent Audit (dated 20.03.25 3:31pm)</li> <li>• Email correspondence from S. Campbell to DCCEEW including the auditor declarations and audit criteria for approval (dated 22.10.25 10:34am)</li> <li>• Email correspondence from S. Campbell to DCCEEW regarding the publication of the audit report (dated 07.05.2025 2:51pm)</li> <li>• Mount Gow, Shelford Section 173 Agreement</li> <li>• 6060 Hamilton Highway, Cressy Section 173 Agreement</li> <li>• Register Search Statement – for Mount Gow Shelford offset site (Volume 9575 Folio 544)</li> <li>• Register Search Statement - for 6060 Hamilton Highway, Cressy (Volume 11971 Folio 512)</li> <li>• Mount Gow, Shelford OMP prepared by Ecology &amp; Heritage Partners (dated February 2021)</li> <li>• 6060 Hamilton Highway, Cressy OMP prepared by Ecology &amp; Heritage Partners (dated May 2023)</li> <li>• Year 3 (2024/25) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology &amp; Heritage Partners (dated November 2025)</li> <li>• 185 Mount Gow Road, Shelford Landowner Report, prepared by Crichton Properties Pty Ltd (dated 1 May 2025)</li> </ul>

Item
<ul style="list-style-type: none"><li>• Year 3 (2023/24) 6060 Hamilton Highway, Cressy Vegetation Assessment Report prepared by Ecology &amp; Heritage Partners (dated October 2025)</li><li>• 6060 Hamilton Highway, Cressy Landowner Report, prepared by Warrambeen Offset Management (dated September 2025)</li><li>• Published OMPs on the GWW WIN project website page (<a href="https://www.gww.com.au/faults-works/upgrades-projects/major-projects/western-irrigation-network-win">https://www.gww.com.au/faults-works/upgrades-projects/major-projects/western-irrigation-network-win</a>)</li><li>• Published Annual Compliance Report on the GWW WIN project website page (<a href="https://www.gww.com.au/faults-works/upgrades-projects/major-projects/western-irrigation-network-win">https://www.gww.com.au/faults-works/upgrades-projects/major-projects/western-irrigation-network-win</a>)</li><li>• Parwan to Melton Pipeline, Victoria: EPBC 2018/8260 Annual Compliance Report (Year 3: 22 November 2024 – 21 November 2025) prepared by Greater Western Water (dated 18.12.25)</li><li>• Approved audit criteria letter from DCCEEW (dated 03.11.25)</li><li>• Letter from DCCEEW to S. Campbell dated 01.05.25.</li><li>• NearMap imagery</li></ul>

## 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
10	5	2

#### 2.2.2 OMP Requirements

Compliant	Non-Compliant	Not Applicable
19	1	2

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 82.86%.

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. It is noted that there are three (3) historical non-compliances carried over from previous audits.

Condition	Non-Compliance Description	Recommended Action
3	Audit 1 found that 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.	This is a historical non-compliance and therefore no further action is recommended.
4	Audit 1 found that DCCEEW was notified by GWW that the Mount Gow offset site had been secure outside of the required 10 business day timeframe.	This is a historical non-compliance and therefore no further action is recommended.
5	The Hamilton Highway OMP landowner report was not submitted within the required timeframe and therefore it is considered that all the conditions of the OMP were not implemented as required.	Project staff should be informed of the requirement that future annual reports are to be submitted within the required timeframe or an extension should be sought as early as possible.

Condition	Non-Compliance Description	Recommended Action
		Dates for the submission of the annual landowner report to GWW for the submission of the report by GWW to TfN and DCCEEW should be programmed into responsible staff calendars.
7	Audit 1 found that DCCEEW was notified of the commencement of the action outside of the required 10 business day timeframe.	This is a historical non-compliance and therefore no further action is recommended.
12	GWW did not advise DCCEEW of the non-compliance with the OMP within the required timeframe.	Project staff should be informed of the requirement that DCCEEW be notified of any future incidents or non-compliances with the OMPs as soon as practicably possible or within 2 business days after becoming aware of the incident or non-compliance.  Documenting the non-compliance process should be consider to minimise potential future non-compliances with this condition.
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 are to be submitted within the required timeframe or an extension should be sought as early as possible.  Dates for the submission of the annual landowner report to GWW for the submission of the report by GWW to TfN and DCCEEW should be programmed into responsible staff calendars.

Refer to Appendix B for a detailed compliance assessment.

## 2.3 Opportunities for Improvement

### Conforming to Timeframes

Similar to the Year 2 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.

On September 2025, GWW received a 'Notice to show cause' from DCCEEW relating to the non-compliance conditions from the Year 2 independent audit. GWW provided a response to DCCEEW on 9 October 2025, outlining reasons for previous non-compliances and future mitigation measures. An approval timeframes tracker has been prepared in order to mitigate potential future non-compliances, including those identified in the Year 3 audit.

### Offset Site Performance

Although the objectives of the OMPs are intended to be achieved over the lifetime of the OMP (10 years), as per the previous years' audits the findings of the Mount Gow Monitoring Report indicated a concerning trajectory. The Mount Gow offset site assessment report found that the overall quality of native vegetation and habitat for Golden Sun Moth has decreased since the implementation of the OMP, however the total

extent of native vegetation is increasing. Additionally, the overall cover of exotic vegetation has increased with several annual and perennial weeds identified within the study area. The report has provided recommendations including continuing to undertake pulse grazing, additional weed control such as spot spraying, active seeding of native grasses, and ecological burn and the 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

In line with the Year 2 audit, there had been no construction work undertaken during the audit period, however GWW continues to demonstrate awareness of the areas of habitat that requires protection and an understanding of the required methods for achieving protection.

## Appendix A. Auditors' Certification

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## Appendix A—Auditor’s Declaration of Independence

I, *[name of auditor]* 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 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.

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



Full name (please print) Melody Valentine

Organisation (please print) CH2M Beca Limited

Date 20 / 10 / 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 vitae 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: **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)**  
**Over 15 years of environmental assessment and 10 years of environmental auditing experience**

Auditor’s declaration:

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: 

Date: **20 January 2026**

*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 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.

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 Environment Institute Of Australia And New Zealand

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



Full name (please print) Francesca Soler

Organisation (please print) CH2M Beca Limited

Date 20 / 10 / 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 vitae 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.

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:



Date: 19 January 2026

*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

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## 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 January 2026

REPORT PREPARED BY: Melody Valentine/Francesca Soler

REPORT APPROVED BY: Stephen Campbell

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
1 Within the project area, the approval holder must not clear more than: <ul style="list-style-type: none"> <li>a. 10.459 hectares of Golden Sun Moth habitat.</li> <li>b. 4.961 ha of NTGVVP</li> </ul>	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.	During the interview with the approval holder, it was advised 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 18 December 2025 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 occurred within the audit period and that no additional clearing had occurred.	Interview with S. Campbell from GWW on 18.12.25. Site visit on 18.12.25. Review of aerial photography 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
2 Prior to the commencement of the action, to compensate for the loss of 10.459 ha of	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 November 2022. The Section 173 Agreement	Email correspondence from S. Campbell to DCCEW (dated 22/12/22 12:59pm) Mount Gow, Shelford Section 173 Agreement	As assessed in the Year 1 audit, the Section 173 Agreements were not finalised prior to the commencement of the action	COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
<p>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.</p>		<p>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.</p> <p>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.</p>	<p>6060 Hamilton Highway, Cressy Section 173 Agreement</p>	<p>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.</p> <p>The Section 173 agreements remain in place; therefore, this item is deemed compliant.</p>	
<p>3 Within 24 months of this approval the offset areas must be secured.</p>	<p>Review Certificate of Title to confirm a conservation covenant is registered on the applicable title(s).</p>	<p>As per the Year 1 audit, the covenant for the Mount Gow, Shelford offset is registered on the title, dated 20 June 2023.</p> <p>The covenant for the 6060 Hamilton Highway, Cressy offset is registered on the title, dated 18 April 2024.</p>	<p>Register Search Statement – for Mount Gow Shelford offset site (Volume 9575 Folio 544)</p> <p>Register Search Statement - for 6060 Hamilton Highway, Cressy (Volume 11971 Folio 512)</p>	<p>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 sites had been secured. While there are no further actions required regarding this condition, this non-compliance remains open.</p>	<p>NON-COMPLIANT</p>

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
<p>4 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>	<p>Review a dated copy of the correspondence provided to the Department containing written evidence, shapefiles and offset attributes.</p>	<p>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 is 29 June 2021 (Mount Gow, Shelford) 30 November 2022 (6060 Hamilton Highway, Cressy).</p>	<p>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)</p>	<p>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. While there are no further actions required regarding this condition, this non-compliance remains open.</p>	<p>NON-COMPLIANT</p>
<p>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.</p>	<p>Review a copy of the Offset Management Plan(s).</p> <p>Review a copy of the latest annual monitoring report and photographs required under the Offset Management Plan(s).</p>	<p>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 November 2022).</p>	<p>Mount Gow, Shelford OMP prepared by Ecology &amp; Heritage Partners (dated February 2021) 6060 Hamilton Highway, Cressy OMP prepared by Ecology &amp; Heritage Partners (dated May 2023) Email correspondence from S. Campbell to DCCEEW (dated 22.12.22 12:59pm) Year 3 (2024/25) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology &amp; Heritage Partners (dated November 2025)</p> <p>185 Mount Gow Road, Shelford Landowner Report,</p>	<p>Audit 1 found that both OMPs were prepared and implemented prior to the commencement of the action. This audit found that while the OMPs are still being actively, there were non-compliance identified with the requirements of the OMPs and therefore GWW is non-compliant with this requirement.</p>	<p>NON-COMPLIANT</p>

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
			prepared by Crichton Properties Pty Ltd (dated 1 May 2025)		
Mount Gow OMP:					
<p>Maintenance and protection of the offset site will be achieved by:</p> <ul style="list-style-type: none"> <li>Stock-proof fencing around the boundary of the offset site;</li> <li>Weed control through active management;</li> <li>Biomass control through high intensity pulse grazing of domestic stock with stock generally excluded from 1st October to 31st January;</li> <li>Controlling pest animals, particularly rabbits and foxes; and</li> <li>Managing native species understorey</li> </ul>	Review the monitoring report undertaken by an independent party to confirm all these controls are in place.	A Vegetation Assessment Report has been prepared by EHP for the Year 3 (2024/25) monitoring of Mount Gow, Shelford, Victoria (dated November 2025). 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. An assessment of measures such as fencing, weed control, biomass control, and pest animal control are included in the report. The landowner report is dated May 2025. It is noted that the landowner held discussions with TfN in September 2024 regarding the management of weeds. These discussions resulted in extending of pulse	<p>Year 3 (2024/25) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology &amp; Heritage Partners (dated November 2025)</p> <p>185 Mount Gow Road, Shelford Landowner Report, prepared by Crichton Properties Pty Ltd (dated 1 May 2025)</p>	The Year 3 monitoring report for the Mount Gow, Shelford site details the maintenance and protection 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 were undertaken or completed and therefore this item is deemed compliant.	COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
diversity and recruitment.		grazing throughout October, as approved by TfN.			
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 undertaken by Ecology & Heritage Partners identified that the fencing on site was maintained in good condition and there were no fence gaps identified. The fencing remained stock-proof and met the requirements of the OMP.	Year 3 (2024/25) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated November 2025)	The Year 3 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 have identified that temporary fencing has been maintained to adequately exclude stock. It is noted following discussion with TfN in September 2024, the landowner was granted approval to extending grazing until October.	Year 3 (2024/25) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated November 2025)  185 Mount Gow Road, Shelford Landowner Report, prepared by Crichton Properties Pty Ltd (dated 1 May 2025)	The Year 3 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 approved 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 3 targets for posts around the offset site perimeter had been met.	Year 3 (2024/25) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated November 2025)  185 Mount Gow Road, Shelford Landowner Report, prepared by Crichton	As the boundary of the offset site has been established this item is deemed compliant.	COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
Eliminate all new and emerging woody weeds.	Review the monitoring report undertaken by an independent party to confirm weed control is adequate.	In Year 3 monitoring all woody weeds were appropriately managed on the offset site. The assessment report noted that woody weeds had reduced to 0% cover with no individuals observed during the 2025 assessment.	Properties Pty Ltd (dated 1 May 2025) Year 3 (2024/25) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated November 2025)	The Year 3 monitoring report for the Mount Gow, Shelford site identified that all 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 assessment report indicated that since the implementation of the OMP, the cover of native grasses and herbaceous plants has considerably decreased as a result of the presence of Toowoomba Canary Grass <i>Phalaris aquatica</i> , spreading across the site. Herbaceous weeds were controlled as per the requirements of the OMP, however new emerging weeds will need to be controlled in subsequent years. The assessment report noted that current management methods were inadequate, and active management will be required to ensure that the percentage of cover meets the requirements of the OMP. The assessment report recommends that the additional pulse grazing into October is continued in subsequent years.	Year 3 (2024/25) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated November 2025)	The Year 3 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 and had achieved the target cover percentage, management actions had still been undertaken as per the requirements of the OMP and therefore this item is deemed compliant.	COMPLIANT

EPBC 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.	Landowner report noted that monitoring for new and emerging weeds has been undertaken with none identified during the assessment period. The assessment report indicated that since the implementation of the OMP, the cover of native grasses and herbaceous plants has considerably decreased as a result of the presence of Toowoomba Canary Grass <i>Phalaris aquatica</i> , 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. The assessment report recommends that the additional pulse grazing into October is continued in subsequent years.	Year 3 (2024/25) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated November 2025)  185 Mount Gow Road, Shelford Landowner Report, prepared by Crichton Properties Pty Ltd (dated 1 May 2025)	The Year 3 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 assessment report identified that targets for pest animals had been met. As per the Year 2 assessment, one old rabbit warren was identified approximately 700m south of the Golden Sun Moth offset area. The warren appeared to have been controlled and was inactive, however it was recommended that the warren was to be immediately fumigated if it had not yet been.	Year 3 (2024/25) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated November 2025)  185 Mount Gow Road, Shelford Landowner Report, prepared by Crichton Properties Pty Ltd (dated 1 May 2025)	The Year 3 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 Method	Evidence	Documents Sighted	Determination	Compliance Finding
		The landowner report noted that due to an increase in rabbit population the landowner engaged in increased hunting activity. It was noted that fox hunting was undertaken, and that fox number remained steady in Year 3.			
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 3 (2024/25) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated November 2025)  185 Mount Gow Road, Shelford Landowner Report, prepared by Crichton Properties Pty Ltd (dated 1 May 2025)	Monitoring and control of new and emerging pest animals on the offset site are being undertaken 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 on-title agreement registration.	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 2024/25 landowner report for the 85 Mount Gow Road, Shelford offsite has been prepared (dated 1 May 2025). The report records management actions undertaken in accordance with the OMP and photographic evidence of these actions.  GWW provided the landowner report to the Department and TfN on 6 May 2025.	185 Mount Gow Road, Shelford Landowner Report, prepared by Charlie Cameron (dated 01.05.2025)  Email correspondence to DCCEEW and TfN from S. Campbell with the landowner report (dated 06.05.25).	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.  The Section 173 registration is dated 22 July 2021 requiring submission of the	COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
<p>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.</p> <p>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.</p> <p>Obligations of the Landowner have been met and the obligations form is signed, dated and submitted with the annual report.</p>				<p>reports by the 22 May annually. As the landowner report is dated 1 May 2025 and the report was submitted on 6 May 2025 it is considered that the provision of the report was undertaken within the required timeframe and is therefore deemed compliant.</p>	

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
<p>Review effectiveness of OMP:</p> <p>Review of OMP after 5 years if there is no improvement of the GSM population.</p>	<p>Not applicable – 5 years has not yet passed.</p>	<p>Not applicable</p>	<p>Not applicable</p>	<p>Not applicable</p>	<p>NOT APPLICABLE</p>
<p>Hamilton Highway OMP – V3:</p>					
<p>Maintenance and protection of the offset site will be achieved by:</p> <p>Stock-proof fencing around the boundary of the offset site and low impact fencing dividing the site into smaller more manageable paddocks;</p> <p>Weed control through active management;</p> <p>Biomass control through light grazing of domestic stock (sheep only) with stock generally excluded from 1st October to 31st January;</p>	<p>Review the monitoring report undertaken by an independent party to confirm all of these controls are in place.</p>	<p>A Vegetation Assessment Report has been prepared by EHP for the Year 3 (2024/25) monitoring of Mount Gow, Shelford, Victoria (dated October 2025). 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 September 2025.</p>	<p>Year 3 (2023/24) 6060 Hamilton Highway, Cressy Vegetation Assessment Report prepared by Ecology &amp; Heritage Partners (dated October 2025)</p> <p>6060 Hamilton Highway, Cressy Landowner Report, prepared by Warrambeen Offset Management (dated September 2025)</p>	<p>The Year 3 monitoring report for the 6060 Hamilton Highway, Cressy 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 3 and therefore this item is deemed compliant.</p>	<p>COMPLIANT</p>

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
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. The fencing remains in excellent stock proof condition. It is noted that during July two bottom wires on the northern boundary were noted as broken, however repairs had been scheduled. Images of the fencing has been provided.	6060 Hamilton Highway, Cressy Landowner Report, prepared by Warrambeen Offset Management (dated September 2025)	The Year 3 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.	6060 Hamilton Highway, Cressy Landowner Report, prepared by Warrambeen Offset Management (dated September 2025)	The Year 3 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
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 and the landowner has detailed weed control management actions within the landowner report.	Year 3 (2023/24) 6060 Hamilton Highway, Cressy Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated October 2025)  6060 Hamilton Highway,	The Year 3 landowner report for the 6060 Hamilton Highway, Cressy has detailed ongoing weed control management actions that had been undertaken on the site and therefore this item is deemed compliant.	COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
			Cressy Landowner Report, prepared by Warrambeen Offset Management (dated September 2025)		
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 detailed weed control management actions within the landowner report. Overall weed coverage on the site has reduced to 8%, down from 31% during Year 1.	Year 3 (2023/24) 6060 Hamilton Highway, Cressy Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated October 2025)  6060 Hamilton Highway, Cressy Landowner Report, prepared by Warrambeen Offset Management (dated September 2025)	The Year 3 landowner report for the 6060 Hamilton Highway, Cressy has detailed ongoing weed control management actions that 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 detailed weed control management actions within the landowner report. Overall weed coverage on the site has reduced to 8%, down from 31% during Year 1. It is noted that additional weeds that were not originally included in the OMP have been identified on the offset site.	Year 3 (2023/24) 6060 Hamilton Highway, Cressy Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated October 2025)  6060 Hamilton Highway, Cressy Landowner Report, prepared by Warrambeen Offset Management (dated September 2025)	The Year 3 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
Monitor and control rabbits and foxes.	Review the monitoring report undertaken by an independent party to	The Year 3 landowner report identifies that regular monitoring of pests is being undertaken on	6060 Hamilton Highway, Cressy Landowner Report, prepared by Warrambeen	The Year 3 landowner report for the 6060 Hamilton Highway, Cressy identified	COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	confirm pest control is adequate.	the offset site. A shooter has been engaged to do quarterly visits to the site.	Offset Management (dated September 2025)	ongoing pest control management actions had been undertaken on the site and therefore this item is deemed 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.	6060 Hamilton Highway, Cressy Landowner Report, prepared by Warrambeen Offset Management (dated September 2025)	Monitoring and control of new and emerging pest animals on the offset site are being undertaken 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 assessment report noted that the organic litter score was lower than the previous monitoring score, however it was dominated by organic litter from native species and was likely due to the timing of the survey. The report notes that the current levels are appropriate, however an ecological burn should be considered in future years if the biomass levels become too high.	Year 3 (2023/24) 6060 Hamilton Highway, Cressy Vegetation Assessment Report prepared by Ecology & Heritage Partners (dated October 2025)	Organic litter and grass density monitoring was undertaken for Year 3 and a recommendation for potential ecological burn in future years was provided and therefore this item is deemed compliant.	COMPLIANT
Prepare and submit an annual report and photo monitoring to TfN and Approval Holder: Report provides enough detail in the form of written comments and supporting evidence	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 Year 3 landowner report for the 6060 Hamilton Highway, Cressy offsite has been prepared (dated October 2025). The report records management actions undertaken in accordance with the OMP and photographic evidence of these actions.  GWW provided the vegetation	Chathams Farm - 6060 Hamilton Highway, Cressy Landowner Report (Year 3 / November 2024- November 2025) prepared by Warrambeen Offset Management (dated October 2025)  Email correspondence from	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 3 landowner report was provided to DCCEE and TfN as per the OMP requirements. However,	NON-COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
<p>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.</p> <p>Allow for ongoing assessment of the effectiveness of management.</p> <p>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.</p> <p>Obligations of the landowner have been met and the obligations form is signed, dated and submitted with the annual report.</p>		<p>assessment and landowner report to the Department and TfN on 1 October 2025.</p>	<p>S. Campbell to DCCEEW relating to the submission of the 6060 Hamilton Highway, Cressy OMP assessment and landowner report (dated 01.10.25 2:27pm)</p>	<p>the Section 173 registration is dated 30 November 2022 requiring submission of the reports by the 30 September annually. As the landowner report was provided to DCCEEW and TfN on 1 October 2025 it is considered that the provision of the report was not undertaken within the required timeframe resulting in a non-compliance.</p>	

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
<p>Review effectiveness of OMP:</p> <p>Review of OMP after 5 years if there is no improvement of the GSM population.</p>	<p>Not applicable – 5 years has not yet passed.</p>	<p>Not applicable</p>	<p>Not applicable</p>	<p>Not applicable</p>	<p>NOT APPLICABLE</p>
<p>6 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</p>	<p>Review a copy of the latest annual monitoring report and photographs required under the Offset Management Plan(s).</p>	<p>The 2024/25 monitoring reports for the Mount Gow, Shelford and 6060 Hamilton Highway, Cressy offset sites detail all required management actions as per the OMP and assess actions that have been undertaken on each site over the past year.</p> <p>Neither landowner reports for both offset sites or monitoring reports have identified any activities that were not previously included within the approved OMPs.</p>	<p>Year 3 (2024/25) Mount Gow, Shelford, Victoria Vegetation Assessment Report prepared by Ecology &amp; Heritage Partners (dated November 2025)</p> <p>185 Mount Gow Road, Shelford Landowner Report, prepared by Crichton Properties Pty Ltd (dated 1 May 2025)</p> <p>Year 3 (2023/24) 6060 Hamilton Highway, Cressy Vegetation Assessment Report prepared by Ecology &amp; Heritage Partners (dated October 2025)</p> <p>6060 Hamilton Highway, Cressy Landowner Report, prepared by Warrambeen Offset Management (dated September 2025)</p>	<p>As there have been no evidence of activities not in compliance with the requirements of the OMPs being undertaken on the offset sites, this item is deemed compliant.</p>	<p>COMPLIANT</p>

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
must not result in a reduced environmental outcome for the Golden Sun Moth or NTGVVP.					
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.	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. There are no further actions are required in relation to this condition, however this non-compliance remains open.	NON-COMPLIANT
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 aerial photography of the site (NearMap). Interview with S. Campbell from GWW on 18.12.25. Site visit on 18.12.25.	While there were no audits conducted during the audit period due to the works being on hold, 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

EPBC 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.	Not applicable	Not applicable	As the Department has not made any requests for any electronic copies of compliance records, the approval holder has not been required to supply any records within specific timeframes.	NOT APPLICABLE
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 January 2023.	Published OMPs on the GWW WIN project website page ( <a href="https://www.gww.com.au/fa ults-works/upgrades-projects/major-projects/western-irrigation-network-win">https://www.gww.com.au/fa ults-works/upgrades-projects/major-projects/western-irrigation-network-win</a> )	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 3 (22/11/24-21/11/25).	Parwan to Melton Pipeline, Victoria: EPBC 2018/8260 Annual Compliance Report (Year 3: 22 November 2024 – 21 November 2025) prepared by Greater Western Water (dated 18.12.25)	An annual compliance report for Year 3 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

EPBC 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 February 2026. The Annual Compliance Report was published onto GWW's WIN project website page on the 6 January 2026.	Published Annual Compliance Report on the GWW WIN project website page ( <a href="https://www.gww.com.au/fa ults-works/upgrades-projects/major-projects/western-irrigation-network-win">https://www.gww.com.au/fa ults-works/upgrades-projects/major-projects/western-irrigation-network-win</a> )  Email correspondence from S. Campbell to <a href="mailto:epbcmonitoring@dcceew.gov.au">epbcmonitoring@dcceew.gov.au</a> regarding the publication of the compliance report of GWW's website page (dated 06.01.26).	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 6 January 2026. On the 6 January 2026 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.	Email correspondence from S. Campbell to <a href="mailto:epbcmonitoring@dcceew.gov.au">epbcmonitoring@dcceew.gov.au</a> regarding the publication of the compliance report of GWW's website page (dated 06.01.26).	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	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	Published Annual Compliance Report on the GWW WIN project website page ( <a href="https://www.gww.com.au/fa">https://www.gww.com.au/fa</a>	The Annual Compliance Report is published on the GWW website, as required by the approval.	COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
website until this approval expires;		was published online on the 6 January 2026.	<p>ults-works/upgrades-projects/major-projects/western-irrigation-network-win)</p> <p>Email correspondence from S. Campbell to epbcmonitoring@dcceew.gov.au regarding the publication of the compliance report of GWW's website page (dated 06.01.26).</p>		
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.	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
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

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
<p>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:</p> <p>a. any condition which is or may be in breach;</p> <p>b. any condition which is or may be in breach;</p> <p>c. the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact</p>	<p>Undertake a site inspection and interview approval holder to identify whether any incidents or non-compliances have occurred during audit period.</p> <p>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.</p>	<p>The 6060 Hamilton Highway, Cressy landowner and assessment report was submitted to DCCEEW and TfN on 1 October 2025, however as per the requirements of OMP the landowner report is required to be submitted by 30 September annually. As the reports were submitted late it was identified as a non-compliance with the OMP requirements.</p> <p>GWW advised DCCEEW of the non-compliance with the OMP on 6 October 2025.</p>	<p>Email correspondence from S. Campbell to DCCEEW regarding non-conformances relating to the 6060 Hamilton Highway, Cressy OMP landowner report (dated 06.10.25 3:21pm)</p>	<p>The landowner and assessment report were submitted 1 October 2025, however GWW did not advise DCCEEW of the non-compliance until 6 October 2025. As DCCEEW was not advised of the non-compliance within the required timeframe this item is deemed non-compliant.</p>	<p>NON-COMPLIANT</p>

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
information cannot be provided, provide the best information available.					
<p>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:</p> <p>a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;</p> <p>b. the potential impacts of the incident or non-compliance; and</p>	<p>Interview approval holder to identify whether any incidents or non-compliances have occurred during audit period.</p> <p>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.</p>	<p>GWW provided details of the non-compliance with the 6060 Hamilton Highway, Cressy OMP on 6 October 2025. This notification provided detail on how further non-compliances are anticipated to be mitigated.</p> <p>The non-compliance occurred on 1 October 2025.</p>	<p>Email correspondence from S. Campbell to DCCEEW regarding non-conformances relating to the 6060 Hamilton Highway, Cressy OMP landowner report (dated 06.10.25 3:21pm)</p>	<p>GWW were able to provide further details of the 1 October 2025 non-compliance to DCCEEW on 6 October 2025. As further details of the non-compliance were provided within the required timeframe this item is deemed compliant.</p>	<p>COMPLIANT</p>

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
c. the method and timing of any remedial action that will be undertaken by the approval holder.					
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 2025  NB: this audit is for the 12 month period from 21 November 2024 – 20 November 2025. The submission date of 21 February 2026 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.	A Year 2 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 2023- 20 November 2024. The audit was subsequently provided to the Department on 20 March 2025.	Email correspondence from S. Campbell to DCCEEW regarding the commencement of action (dated 13.12.2022 1:52pm). Email correspondence from S. Campbell to DCCEEW regarding the Year 2 Independent Audit (dated 20.03.25 3:31pm) Parwan to Melton Pipeline, Victoria EBPC Act Independent Audit (EPBC Approval 2018/8260), prepared by CH2M Beca (Dated 20.03.25)	An independent audit was conducted for the 12-month period from 21 November 2023- 20 November 2024 and assessed the project's compliance with the condition of the approval and therefore this item is deemed compliant	COMPLIANT
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	COMPLIANT

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
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 DCCEEW on 22 October 2025. The Department approved the proposed auditors and audit criteria on 3 November 2025.	Approved audit criteria letter from DCCEEW (dated 03.11.25) Email correspondence from S. Campbell to DCCEEW including the auditor declarations and audit criteria for approval (dated 22.10.25 10:34am)	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 condition have met the Department's requirements and therefore it is deemed that Condition 15 is 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.	DCCEEW approved the proposed auditors and audit criteria on 3 November 2025. The independent audit did not commence until the 18 December 2025 when an interview with the approval holder and site visit was undertaken.	Approved audit criteria letter from DCCEEW (dated 03.11.25)		
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 2026	The approved proposed auditors and audit criteria received from DCCEEW on 3 November 2025 advised that the independent audit report was due no later than 22 January 2026.	Not applicable.  NB: The approval letter received from the Department on 3 November 2025 noted that the independent audit report was due no later than 22 January 2026.		

EPBC Approval Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
<p>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.</p>	<p>Review a copy of the correspondence received from the department approving the audit report.</p> <p>Review approval holder website to confirm publication of audit report.</p>	<p>DCCEEW issued a letter to GWW on 1 May 2025 advising that the Year 2 (2023/24) independent audit report had been approved.</p> <p>The independent audit report was published onto GWW's website on 7 May 2025.</p>	<p>Letter from DCCEEW to S. Campbell dated 01.05.25.</p> <p>Email correspondence from S. Campbell to DCCEEW regarding the publication of the audit report (dated 07.05.2025 2:51pm)</p> <p>GWW WIN project website page (<a href="https://www.gww.com.au/fa ults-works/upgrades-projects/major-projects/western-irrigation-network-win">https://www.gww.com.au/fa ults-works/upgrades-projects/major-projects/western-irrigation-network-win</a>)</p>	<p>As the independent audit report was published on the website within the required timeframe this item is compliant.</p>	<p>COMPLIANT</p>
<p>17 Within 20 business days after whichever is the earlier of:</p> <p>a. the completion of the action or</p> <p>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.</p>	<p>No verification proposed – condition 17 requirements will occur following completion of Audit Report.</p>	<p>Not applicable</p>	<p>Not applicable</p>	<p>Not applicable</p>	<p>NOT APPLICABLE</p>

## Appendix C. Site Assessment Photographs

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## Site Assessment

A site visit of the M2BM project was undertaken on 18 December 2025. There were no works or vegetation clearing during the audit period. During the site visit, areas of 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

Location	Site Photo
1	



2

