

ENVIRONMENTAL MANAGEMENT STRATEGY

August 2024

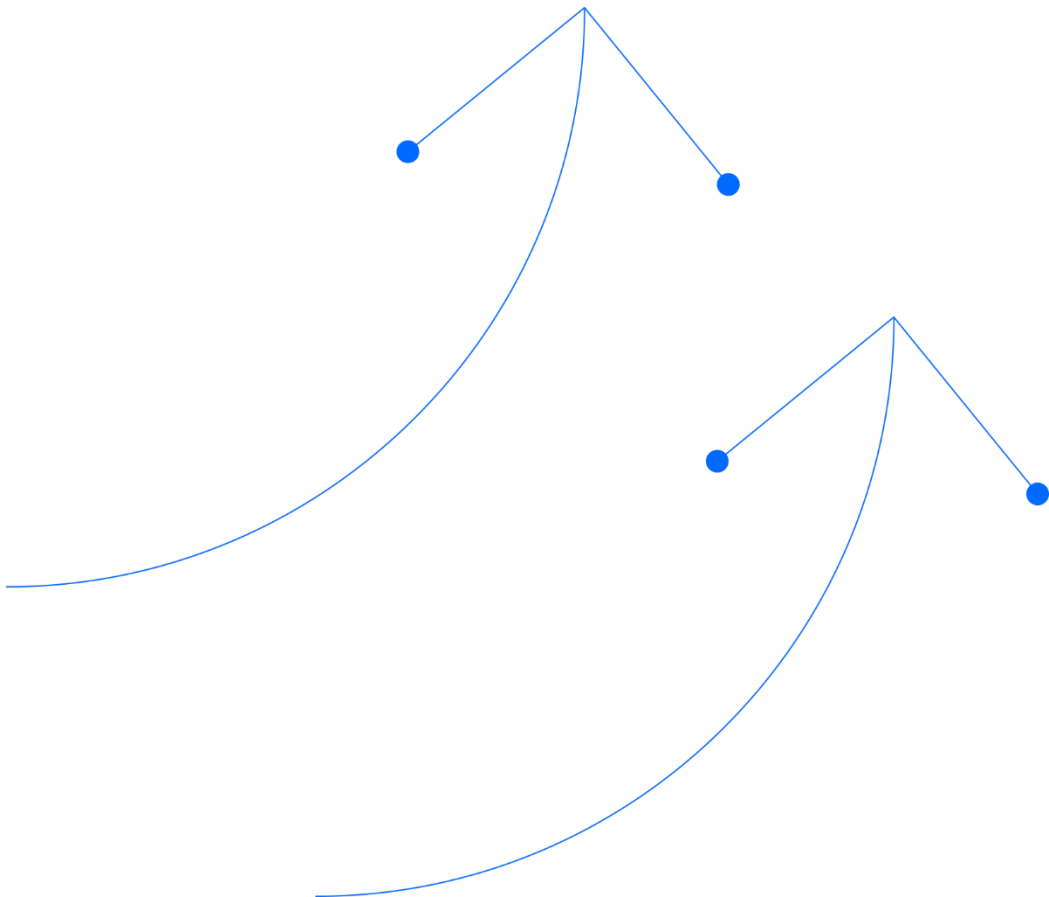


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Document Review History

In accordance with Project Approval condition 6.5, this document has been reviewed as follows:

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Note: This table will only be updated when the document is revised. For all reviews that do not result in a document revision or update, the review mechanism and outcomes are captured in Landfolio.

Terms and abbreviations

| Abbreviations | Terms |
|--------------------|--|
| APGA | Australian Pipelines and Gas Association Ltd |
| APIA | Former Australian Pipeline Industry Association (now APGA) |
| BCA | Building Code of Australia |
| BCS | The Biodiversity, Conservation & Science directorate within DPE |
| CEMP | Construction Environmental Management Plan |
| CoA | Conditions of approval for the HGP, Project Approval 06_0286 |
| CoEP | APGA Code of Environmental Practice – Onshore Pipelines |
| CNMP | Construction Noise Management Plan |
| DCCEEW | The NSW Department of Climate Change, Energy, the Environment and Water |
| DECC | The former NSW Department of Environment and Climate Change (now DCCEEW) |
| DPE | The former NSW Department of Planning and Environment (now DPHI) |
| DPHI - Crown Lands | The Crown Lands entity within DPHI |
| DPHI | The NSW Department of Planning, Housing and Infrastructure |
| DPIE | The former NSW Department of Planning, Industry and Environment |
| EA | The Environmental Assessment for the Project |
| EHS Policy | Santos Environment, Health & Safety Policy |
| EMS | Environmental Management Strategy |
| EPA | The NSW Environment Protection Authority |
| EP&A Act | Environmental Planning and Assessment Act 1979 (NSW) |
| EPBC Act | Environment Protection and Biodiversity Conservation Act 1999 (Cth) |
| EPL | An environment protection licence under the POEO Act |
| GLG | Government Liaison Group |
| HGP | Hunter Gas Pipeline |
| HSE | health, safety and environment |
| LLS | Local Land Services NSW |
| NSW LRS | Land Registry Service |
| m | metre |
| OECC | NSW Office of Energy and Climate Change (now DCCEEW) |
| OEMP | Operational Environmental Management Plan |
| OEH | The former NSW Office of Environment and Heritage |
| PMP | Pipeline Management Plan |
| POEO Act | Protection of the Environment Operations Act 1997 (NSW) |
| SMS | Santos Management System |

| | |
|----------|---|
| SoC | Statement of Commitments |
| SSI | State significant infrastructure |
| T&I SEPP | State Environmental Planning Policy (Transport and Infrastructure) 2021 |
| TfNSW | Transport for NSW (formerly RMS) |
| CTMP | Traffic Management Plan for construction |
| WM Act | Water Management Act 2000 (NSW) |
| WMP | Water Management Plan |
| WSP | water sharing plan |

1. Introduction

1.1. Hunter Gas Pipeline

1.1.1. Background

Hunter Gas Pipeline Pty Ltd (Santos) proposes to construct an approximately 833 kilometre (km) high pressure gas transmission pipeline to supply gas from Wallumbilla in the Surat Basin of south central Queensland to the Newcastle area in NSW. The gas transmission line is referred to as the Queensland Hunter Gas Pipeline (HGP), with approximately 222 km located in Queensland and 611 km in NSW.

Project Approval 06_0286 was granted for the NSW portion of the pipeline on 11 February 2009. This approval was subsequently transitioned from Part 3A of the *Environmental Planning and Assessment Act 1979* (NSW) (EP&A Act) to State Significant Infrastructure (SSI) by Ministerial order published on 20 July 2018 pursuant to Clause 5, Schedule 2 of the *Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017* (NSW). The project is also taken to be Critical SSI (CSSI) for the purposes of section 5.13 of the EP&A Act by reference to Clause 5(7), Schedule 2 of the *Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017* (NSW) because it had previously been declared a "critical infrastructure project". A request to modify the conditions of approval (CoA) was submitted on 18 October 2018 and subsequently approved on 17 October 2019, which extended the lapsing date of the approval to 15 October 2024.

The underground pipeline route passes close to the Narrabri Gas Project (NGP) and the goal is to work with infrastructure developers and owners to construct the pipeline and deliver much-needed gas to east coast domestic markets in the shortest timeframe possible. Once the pipeline has been constructed, landholders can continue to undertake agricultural activities within the easement. When fully operational, the NGP has the potential to deliver more than half of the natural gas that goes into the NSW market each day, ensuring people in NSW receive locally produced gas creating a more secure and affordable supply for families and businesses.

1.1.2. Current approved project

Santos has scheduled the construction of the HGP (the Project), in three distinct stages, defined as follows:

- **Stage 1 – Commencement of works, starting Q4 2023**

Stage 1 activities are Project early works and will involve the construction of temporary laydown yards at multiple strategic locations along the proposed HGP alignment. These yards will be utilised to securely store construction equipment, pipe and other materials, as they become available to Santos. Stage 1 includes the use of the laydown yards until the commencement of Stage 2. Access to and from each laydown yard will also be constructed as required. Site offices will be constructed on the laydown or, where existing buildings are present on the property, these may be utilised by the project team to support material logistics coordination, survey and land access activities to finalise the 30 metre pipeline easement. Specific details comprising Stage 1 will be contained in the Stage 1 Preliminary Works Construction Environmental Management Plan (CEMP).

- **Stage 2 – Construction and operation of the Narrabri to Newcastle section of pipeline**

Stage 2 will involve the construction and operation of the approximately 413 km section of the HGP, commencing south of Baan Baa in the Narrabri Shire Council area and terminating in Newcastle where gas will be delivered into the NSW domestic market. It will also include the activities / Project sites developed as part of Stage 1. Construction is scheduled to begin in 2024 or as soon as all requisite Project approvals are in place, including a pipeline licence required under Part 3 Section 11 of the *Pipelines Act 1967* (NSW) (Pipelines Act). The final scope, footprint and location of the pipeline corridor will be determined following more detailed site investigations and will be presented in the Stage 2 CEMP and associated management plans. Any off-take points will be determined as part of Stage 2.

- **Stage 3 – Construction and operation of the Wallumbilla to Narrabri section of the pipeline**

Stage 3 will comprise the construction and operation of the remaining section of the HGP, commencing at Wallumbilla in Queensland, and terminating south of Baan Baa, where Stage 2 works commenced. The final scope, footprint and location of the pipeline corridor will be determined following detailed site investigations and

will be presented in the Stage 3 CEMP and associated management plans. There is currently no scheduled commencement for this Stage of the Project.

The pipeline alignment is presented in Figure 1.1, detailing the sections to be constructed during Stage 2 and Stage 3.

The final pipeline alignment will be determined through consultation with affected landholders, traditional owners, infrastructure owners and relevant government departments, as well as in consideration of factors such as land use, cultural, environmental, technical and economic elements. Temporary facilities will be established based on logistical requirements, and the final selected pipeline alignment. The pipeline will be buried for its entire length and will be identified with line-of-sight markers positioned clearly on the pipeline easement. Once constructed, facilities such as isolation valves, meters, and regulators will be the only infrastructure features above ground.

The route alignment will be within the corridor identified in the EA documents, and any deviations in route alignment outside this corridor will only occur for the purpose of:

- a. reducing impacts to biodiversity, cultural heritage or human amenity;
- b. avoiding geological or topographical constraints, providing the deviations do not increase impacts to those areas referred to under a); and
- c. after consultation with potentially affected landholders and relevant agencies.

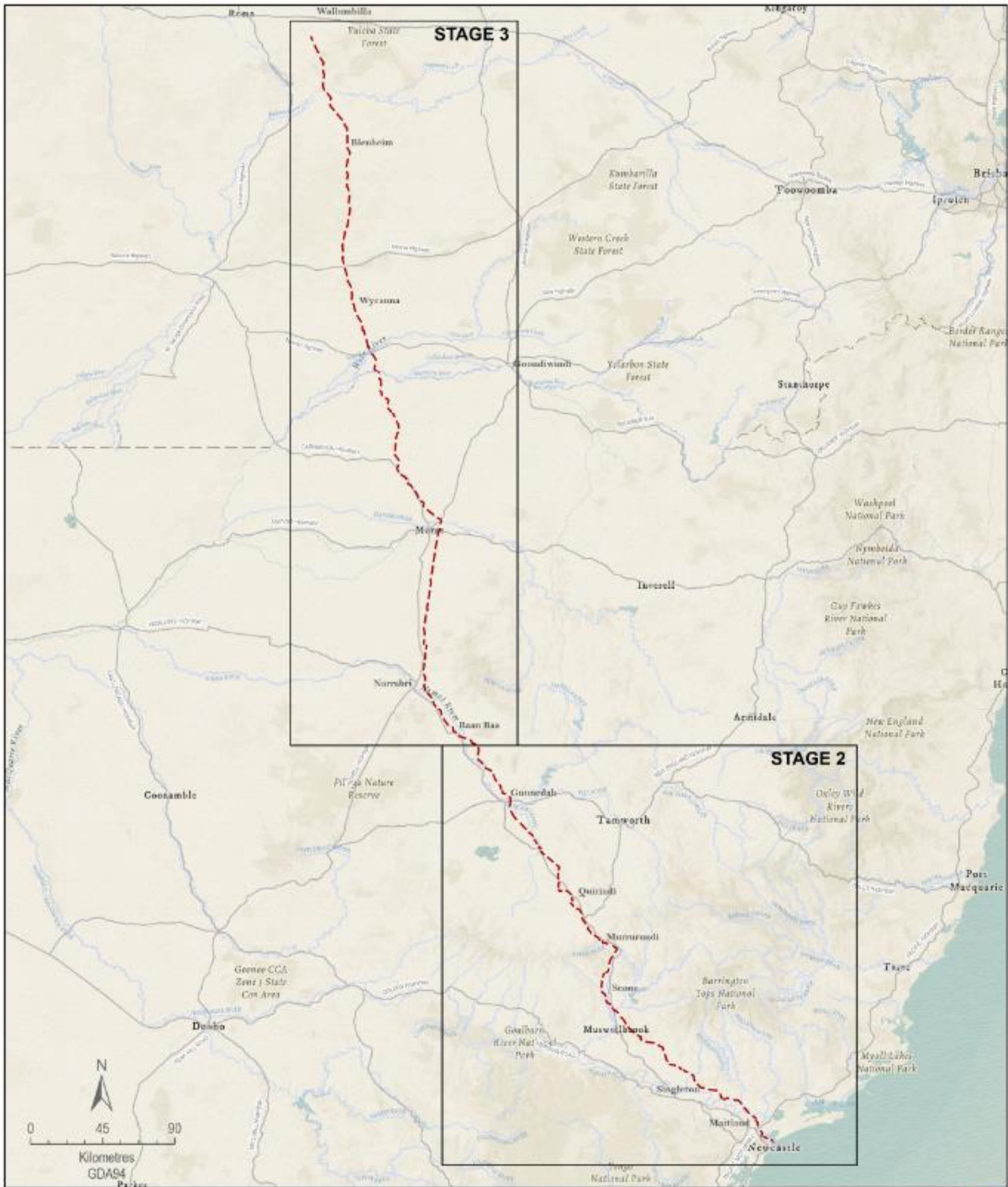
The pipeline will be constructed within a registered easement entered into or acquired under the Pipelines Act (refer to section 2.1.2). A nominal 30 m pipeline easement will be required for the length of the pipeline.

In accordance with the CoA 6.1, Santos obtained the agreement of the Planning Secretary on 4 October 2023 to stage the preparation and approval of the management plans and studies required by the CoA. The staging approval, presented in Appendix A, reflects the above proposed staging of construction and operation, and at this time, only those management plans specific for Stage 1 activities have been developed. The list of relevant management plans and the proposed approach to staging is provided in section 4.3.

Details regarding the staging of the works and the exact scope for each stage, or part thereof, are provided in the approved CEMP relevant to each stage. As required by the CoA 4.1, Santos will notify DPHI in writing of the date of commencement of:

- a. any stage of construction of the project;
- b. the commissioning of the pipeline; and
- c. the operation of the pipeline.

All notifications will be made via the Major Projects Portal.



LEGEND

- Pipeline route
- Highways
- Major watercourses

HUNTER GAS PIPELINE

Figure 1.1

Pipeline alignment - staged construction

Figure 1.1- Hunter Gas Pipeline

1.2. Purpose and scope

Santos has developed this HGP Environmental Management Strategy (EMS) in accordance with CoA 5.1 to provide the strategic framework for environmental management of the Project. It also outlines the environmental management obligations of Project Approval MP06_0286 (Project approval) and the Statement of Commitments (SoC) made in the Environmental Assessment (EA). This EMS applies to the whole Project, however will be revised and updated as required, as the Project progresses through the development stages and into operations. This is in accordance with the staging approach outlined above and the approval granted by the Planning Secretary on 4 October 2023 to stage the preparation and approval of the management plans and studies required by the CoA.

The EMS provides the management framework to effectively identify and control potential environmental impacts in order to achieve compliance with the CoA and regulatory requirements applicable to the Project. The Strategy applies to all employees and contractors associated with the Project. Service providers and suppliers may operate under their own environmental management strategy.

In accordance with CoA 1.1, Santos will carry out the Project:

- a. generally, in accordance with the EA ; and
- b. in accordance with the CoA.

In accordance with CoA 1.2, Santos acknowledges that in the event of any inconsistency between the EA documents and the CoA, the most recent document will prevail to the extent of the inconsistency. However, the CoA will prevail to the extent of any inconsistency.

In managing the Project and in accordance with CoA 1.3, Santos will comply with any reasonable requirement(s) of the Planning Secretary arising from the DPHI's assessment of:

- a. any documents that are submitted in accordance with the Project Approval; and
- b. the implementation of any actions or measures contained in these documents.

1.3. Objectives

The main objectives of this EMS are to:

- provide the strategic framework for environmental management of the Project;
- identify the statutory approvals that apply to the Project in the relevant Stage;
- describe the role, responsibility, authority and accountability of key personnel involved in the environmental management of the Project;
- encourage continual improvement of performance regarding the environment and community;
- describe how the local community and relevant government agencies will be kept informed about progress of the Project; and
- identify processes to receive, respond to, record and report complaints, resolve disputes, and respond to non-compliances, incidents and emergencies that may occur during the Project.

1.4. Consultation

In accordance with the CoA, Santos will consult and liaise with the following regulatory agencies, departments and entities during the finalisation of the pipeline alignment and/or the preparation of the required management documents as relevant to each stage of the Project:

- Department of Planning, Housing and Infrastructure (DPHI);
- Biodiversity, Conservation and Sciences Directorate within DCCEEW (BCS);
- Local Land Services (LLS) (North West, Hunter);

- Department of Primary Industries (DPI) Fisheries;
- DPI Agriculture;
- DCCEEW (Water);
- DCCEEW (Heritage NSW);
- DCCEEW (NSW Climate and Energy Action);
- Crown Lands; and
- local governments including Narrabri, Gunnedah, Liverpool Plains, Upper Hunter, Muswellbrook, Singleton, Maitland City, Port Stephens and Newcastle councils;

1.5. Distribution

A copy of the latest approved EMS will be available to all Santos personnel via the Santos intranet. In accordance with CoA 5.2, the latest approved version will also be made publicly available on the Project website from the commencement of construction of the Project. This information will be kept up to date.

Note that any printed copies of this EMS are uncontrolled.

2. Regulatory requirements and approvals

Santos conducts its activities associated with the HGP in accordance with applicable Commonwealth (Cth) and NSW State environmental, planning and natural resource legislation and all requirements of relevant statutory authorities. Legislative and regulatory obligations are generally recognised through the imposition of conditions on the project approvals, permits, licences and leases (collectively referred to as 'approvals'). Santos maintains a register of relevant environmental legislative and regulatory requirements which is regularly reviewed and maintained.

2.1. Relevant legislation

This section provides a summary of the respective Commonwealth and NSW State legislation directly relevant to the construction and operation of the HGP. Not all legislation / regulatory requirements are relevant to all Project stages. The additional management plans to be prepared under the CoA will provide further details about specific legislative requirements and approvals relevant to the information contained in those plans.

2.1.1. Commonwealth legislation

2.1.1.1. Environment Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) provides a legal framework to protect and manage nationally and internationally important flora and fauna, ecological communities, and heritage places defined as MNES.

The Project was referred to the Commonwealth under Section 75 of the EPBC Act on 29 September 2008 (EPBC/2008/4620). On 23 December 2008, the Commonwealth determined that the proposed action is not a controlled action made on 23 December 2008 and as such does not require approval under the EPBC Act.

2.1.1.2. Native Title Act 1993

The *Native Title Act 1993* recognises and protects native title and provides that native title cannot be extinguished contrary to the Act. Essentially, the Act covers actions affecting Native Title and the process for determining whether native title exists and compensation for actions affecting Native Title. It establishes the Native Title Registrar, the National Native Title Tribunal, the Register of Native Title Claims and the Register of Indigenous Land Use Agreements, and the National Native Title Register.

A Native Title Claim by the Gomeri People applies to a large section of the HGP alignment. Santos respects and acknowledges native title rights and interests in the area and will seek to address those rights and interests which exist over the HGP alignment.

2.1.2. NSW State legislation

2.1.2.1. Environmental Planning and Assessment Act 1979

The EP&A Act provides the statutory basis and framework for planning and environmental assessment in NSW. The EP&A Act includes provisions to ensure that the potential environmental impacts of a development are assessed and considered in the decision-making process.

Project Approval 06_0286 was granted to Hunter Gas Pipeline Pty Ltd on 11 February 2009. The Project Approval was modified on 17 October 2019 (MP06_0286) to extend the lapse date to 15 October 2024.

The Project was declared by Ministerial order published on 20 July 2018 to be SSI under clause 5 of Schedule 2 to the *Environmental Planning and Assessment (Savings, Transitional and Other*

Provisions) Regulation 2017 (NSW). The Project is also taken to be a Critical SSI (CSSI) project for the purposes of section 5.13 of the EP&A Act by reference to clause 5(7) of Schedule 2 of the *Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017* (NSW) because it had previously been declared a “critical infrastructure project”.

Section 5.23 of the EP&A Act outlines the authorisations that are not required for an SSI that is authorised by a development consent granted under Division 5.2 of Part 5. These relevantly include:

- a water use approval under Section 89; a water management work approval under Section 90; or an activity approval (other than an aquifer interference approval) under Section 91 of the WM Act;
- a dredging and reclamation work permit under Section 201; or a permit to obstruct fish passage temporarily or permanently under Section 219 of the *Fisheries Management Act 1994* (NSW).
- an Aboriginal Heritage Impact Permit under Section 90 of the *National Parks and Wildlife Act 1974* (NSW).
- an approval under Part 4, or an excavation permit under Section 139, of the *Heritage Act*; and
- Division 8 of Part 6 of the *Heritage Act*, which relates to controlling and restricting harm to buildings, works, relics and places not subject to interim heritage orders or State heritage register listing.

Although the abovementioned authorisations are not required under sections 5.23 of the EP&A Act, any relevant associated code, standard, policy or guideline will generally still be considered in the carrying out of the Project. These are listed in section 2.2

Further, section 5.24 of the EP&A Act prescribes the authorisations that cannot be refused if they are necessary for carrying out an approved SSI project and must be granted in a manner that is substantially consistent with a project approval. These authorities relevantly include:

- an EPL under Chapter 3 of the POEO Act (for any of the purposes referred to in section 43 of the POEO Act);
- a consent under section 138 of the *Roads Act 1993* (NSW); and
- a licence under the *Pipelines Act 1967* (NSW).

2.1.2.2. Pipelines Act 1967

The NSW Government licenses the construction and operation of major conveyance pipelines under Part 3 of the *Pipelines Act 1967* (NSW), through the issue of a pipeline licence by the Minister for Energy. Pipeline licences must be granted in a manner that is consistent with the planning approval for the Project and may contain additional conditions imposed by the Minister for Energy. The licence will allow for the construction and operation of the approved pipeline. Licences may be varied upon application to the Minister.

Under Section 15 of the *Pipelines Regulation 2023* (NSW) (Pipelines Regulation), a pipeline licensee must give the Secretary a Pipeline Management Plan for the pipeline no later than 6 months after the commencement of the operation of the pipeline.

Santos will obtain a pipeline licence for the Project prior to construction of Stage 2 and Stage 3 of Project. This EMS will be updated to reflect any obligations in the licence once granted. Easements will also be created to facilitate the construction and operation of the Project at the time the licence is granted.

2.1.2.3. Crown Lands Management Act 2016

Crown land is governed by the *Crown Land Management Act 2016* (NSW) (CLM Act). It provides a framework for the NSW Government, local councils and members of the community to work together to provide care, control and management over Crown land. Section 5.47 of the CLM Act permits the Minister to grant and release easements over Crown land. A grant of easement does not grant ownership of the land, and the land continues to be owned by the Crown in right of NSW.

The HGP project will intersect Crown lands. Santos will consult with Crown Lands and negotiate measures to be applied during construction and operation of the project so as to minimise the impact to the environment on Crown lands.

2.1.2.4. Water Act 1912

The *Water Act 1912* (NSW) (Water Act) has historically been the primary legislation managing water resources in NSW. The Water Act governs access, trading and allocation of licences associated with both surface water and groundwater sources and is currently being progressively phased out and replaced by water sharing plans (WSPs) under the *Water Management Act 2000* (WM Act).

The elements to which the Water Act applies include extraction of water from a river, extraction of water from groundwater sources, aquifer interference (less than 3 megalitres [ML] per year) and diversion works of surface water runoff for capture (of a capacity less than basic landholder rights).

The surface water and groundwater systems associated with the Project are currently regulated by WSPs under the WM Act.

2.1.2.5. Water Management Act 2000

The WM Act is progressively being implemented throughout NSW to manage water resources, superseding the *Water Act 1912*. The aim of the WM Act is to ensure that water resources are conserved and properly managed for sustainable use benefiting both present and future generations.

As set out above, approvals under Sections 89-91 of the WM Act are not required for approved SSI projects. In the event another licence or approval under the WM Act is required for the construction, commissioning or operation of the Project, this will be obtained in accordance with the WM Act.

2.1.2.6. Protection of the Environment Operations Act 1997

The *Protection of the Environment Operations Act 1997* (NSW) (POEO Act) aims to protect, restore, and enhance the quality of the environment. It prescribes offences mainly regarding pollution of the environment (water, air, noise, waste) and regulates any pollution through the control of environment protection licences (EPLs). Activities ('scheduled activities') requiring an EPL are listed in Schedule 1 of the Act.

The construction of a pipeline is not listed in Schedule 1 of the POEO Act as a scheduled activity, as such no EPL is required for the construction and operation of the HGP. Nevertheless, under section 148 of the POEO Act, Santos has a duty to report pollution incidents where material harm to the environment is caused or threatened.

2.1.2.7. Biosecurity Act 2015

The *Biosecurity Act 2015* (NSW) regulates pests, diseases and weeds in NSW. The primary objective of the Act is to provide a framework for the prevention, elimination and minimisation of biosecurity risks posed by biosecurity matter, dealing with biosecurity matter, carriers and potential carriers, and other activities that involve biosecurity matter, carriers or potential carriers.

Hygiene, and measures to minimise the potential for the spread of weeds, pests and pathogens as required by the Act, and in accordance with landholder agreements, will be implemented for the Project.

2.1.2.8. Heritage Act 1977

The *Heritage Act 1977* (NSW) (Heritage Act) is used to regulate development impacts on the State's historical heritage assets. To assist with the management of the State's heritage assets, the Heritage Act distinguishes between items of local and State heritage significance. Items that are assessed as having State heritage significance can be listed on the NSW State Heritage Register. Archaeological features and deposits are afforded statutory protection by the 'relics provisions' of the Heritage Act.

Land disturbance or excavation that will, or is likely to, result in a relic being discovered, exposed, moved, damaged or destroyed is prohibited under the provisions of the Heritage Act, unless carried out in accordance with an Excavation Permit pursuant to Section 140, or an Archaeological Exception under Section 139 of the Heritage Act.

An Excavation Permit under Section 139 of the Heritage Act is not required for an approved SSI project. Notwithstanding, Santos will identify and manage historical heritage assets in accordance with the Heritage Act.

2.1.2.9. Roads Act 1993

The *Roads Act 1993* (NSW) (Roads Act) sets out the rights of the public with regard to access to public roads.

Under Section 138 of the Roads Act, a person must not undertake any works that impact on a road, including connecting a road (whether public or private) to a classified road, without consent of the relevant authority, being either TfNSW or local council, depending upon classification of the road. Section 138 consents will be sought as required for where the Project results in disturbance to roads or within the road reserve in close proximity to the road pavement. These must be granted in a manner that is consistent with the Project Approval (Section 5.24(1)(f) of the EP&A Act).

2.1.2.10. Rural Fires Act 1997

The *Rural Fires Act 1997* (NSW) (Rural Fires Act) facilitates the prevention, mitigation and suppression of bush and other fires in local government areas and parts of the State considered to be rural fire districts.

A portion of the Project is mapped as bushfire prone. The required precautions will be taken to minimise the risk of the Project starting bushfires.

2.2. Relevant codes, standards, policies and guidelines

Santos will design, construct, operate, maintain and decommission all works in accordance with the requirements and obligations in all codes, standards, policies and guidelines that are relevant to the Project construction activities. These are further addressed in the CEMP and associated plans.

2.2.1. APGA Code of Environmental Practice

As required by CoA 2.10, the Project will be constructed in accordance with the Australian Pipelines and Gas Association (APGA) *Code of Environmental Practice – Onshore Pipelines* (Revision 5, 2022) (CoEP), which provides industry accepted guidance on environmental management through the planning and asset acquisition, construction, operational and decommissioning periods of a pipelines' lifecycle.

The CoEP is the primary guidance document on environmental management for the pipelines industry and is focused on the key activities conducted during these different pipeline lifecycle periods, and the potential environmental risks that arise from these activities. It assists industry to identify and meet its legal obligations to environmental management.

2.2.2. Interim Construction Noise Guideline

The *Interim Construction Noise Guideline* (DECC, 2009) (Interim Construction Noise Guideline) was developed to focus on applying a range of work practices most suited to minimise construction noise impacts, rather than focusing only on achieving numeric noise levels. While some noise from construction sites is inevitable, the aim of the Interim Construction Noise Guideline is to protect the majority of residences and other sensitive land users from noise pollution most of the time.

The Interim Construction Noise Guideline will be utilised in the development of the Construction Noise Management Plan (CoA 6.3) for each Project stage and to identify methods for managing noise from construction works associated with the HGP.

2.2.3. NSW Industrial Noise Policy and Noise Policy for Industry

The Project was assessed against the (then) Director-General's requirements which referenced the *Industrial Noise Policy* (INP) (EPA, 2000). The INP has since been superseded by the *Noise Policy for Industry* (NPfI) (EPA, 2017). Under the NPfI transitional arrangements published by the EPA, the Director-General's requirements referencing the INP were carried through the planning approval process. CoA 6.4(j) refers to the NPfI and the requirement that the Operation Environmental Management Plan (OEMP) includes measures to minimise the operational noise impacts of the Project and ensure it complies with the relevant noise criterion specified in the NPfI.

2.2.4. Road Noise Policy

The *Road Noise Policy* (DECCW, 2011) (Road Noise Policy) outlines the range of measures needed to minimise road traffic noise and its impacts.

The Road Noise Policy will assist Santos to assess and mitigate the impacts of traffic noise from the Project over residential and other sensitive lands. It links with other NSW Government policies and plans to ensure that where road traffic exists, its noise impacts are appropriately identified and addressed.

2.2.5. Watercourse crossings

Santos will prepare in accordance with *APGA Code of Environmental Practice – Onshore Pipelines* and the *Guidelines for Controlled Activities on Waterfront Land* (NRAR, 2018), or their latest versions, site-specific watercourse crossings and details of associated methods of construction. Consultation will be undertaken with the LLS, and prior to the submission of the Stage 2 CEMP as required under CoA 6.2 these documents will be submitted for the endorsement of NRAR. Santos will also consult with NSW Fisheries in relation to any temporary infrastructure or works in and around watercourses that may result in the blockage of fish passage.

2.2.6. Managing Urban Stormwater: Soils and Construction

Managing Urban Stormwater: Soils and Construction - Volume 1 (Landcom 2004), more commonly known as the 'Blue Book', provides support for developments to reduce the impacts of land disturbance activities on waterways by better management of soil erosion and sediment control. It provides guidance for the design, construction and implementation of measures to improve stormwater management during the construction stage of land development.

Volume 1 is specifically for urban works. It has been complemented by a series of publications in 2007 and 2008 combined as *Managing Urban Stormwater: Soils and Construction - Volume 2* which cover installation of services, waste disposal sites, quarries and other mining sites, major road and highway construction, and construction of unsealed roads access tracks in bushland and rural area. The purpose of the publications in Volume 2 is to provide guidelines, principles and recommended design standards for good management practice in erosion and sediment control during the construction and repair of unsealed roads, services and linear infrastructure.

Project soil and water management controls will be implemented during construction activities in accordance with the Blue Book, as required by CoA 3.22.

2.2.7. Waste Classification Guidelines

The *Waste Classification Guidelines* (EPA, 2014) (Waste Classification Guidelines) have been developed to help waste generators classify the wastes they produce. The guidelines are a step-by-step process for classifying waste into one of special waste, liquid waste, hazardous waste, restricted solid waste, general solid waste (putrescible), or general solid waste (non-putrescible). To simplify the classification process, a number of commonly generated wastes have been pre-classified as either hazardous, restricted solid, general solid waste (putrescible) or general solid waste (non-putrescible) in the waste classification definitions of Schedule 1 of the POEO Act.

Waste generated by the Project will be classified in accordance with the Waste Classification guidelines, as required by CoA 3.35.

2.2.8. Acid Sulphate Soils Manual

Any acid sulphate soil (ASS) encountered during construction of the Project will be treated and disposed of in accordance with the *Acid Sulphate Soils Manual* (Acid Sulphate Soil Management Advisory Committee, 1998) (Acid Sulfate Soil Manual) or its latest version, as required by CoA 3.26.

The Acid Sulfate Soils Manual outlines best practice in assessing and managing the impacts of proposed works in areas likely to contain ASS, and provides guidance for on-site management.

2.2.9. Australian Standard 2885

Australian Standard AS 2885 *Pipelines - Gas and Liquid Petroleum* establishes requirements for the safe design, construction, inspection, testing, operation and maintenance of high pressure pipelines. These requirements are necessary for the protection of the general public, the operating personnel, and the environment, as well as the protection of the pipeline against accidental damage.

Pipelines licensed under the NSW Pipelines Act are generally designed, constructed, operated and maintained in accordance with AS 2885, and it is expected that this will be a condition of the Project's pipeline licence, once obtained. Construction and public signage of the pipeline as per AS 2885 are also requirements of CoA 1.6 and CoA 6.4.

2.2.10. Building and demolition

Santos will construct all new buildings and structures, and any alterations or additions to existing buildings and structures that are part of the Project in accordance with the relevant requirements of the *Building Code of Australia*, as required by CoA 1.6. In compliance with CoA 1.7, Santos will carry out all demolition of applicable structures in accordance with the Australian Standard AS 2601-2001 *The Demolition of Structures* (Standards Australia, 2001).

3. Compliance requirements

This section provides an overview of the compliance requirements relevant to the construction and operation of the Project associated with the following approvals and licences, which are relevant to this EMS:

- Project Approval MP 06_0286;
- Pipeline licence (once obtained), and,
- EA Statement of Commitments

3.1. Project Approval MP 06_0286

There are a number of Project Approval conditions that are directly relevant to the EMS. CoA 5.1 is outlined below. The conditions from Schedule 2 are provided in full in Table B1 in Appendix B. This table also specifies where each condition is addressed in this EMS.

Note that the terms of the approval (CoA 1.1 to 1.3) are addressed in section 1.2, and a number of the construction-specific approval conditions are addressed in the management plans and studies.

CoA 5.1 states that prior to the commencement of the construction of the Project, Santos must prepare an EMS for the Project to the satisfaction of the Planning Secretary. This EMS must:

- a. provide the strategic framework for environmental management of the Project;
- b. identify the statutory approvals that apply to the Project;
- c. describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Project; and
- d. describe the procedures that would be implemented to:
 - keep the local community and relevant agencies informed about the progress and performance of the Project;
 - receive, handle, respond to and record complaints;
 - resolve any disputes that may arise during the Project;
 - respond to any non-compliance; and
 - respond to any incidents or emergencies.

Santos will ensure that all licences, permits and approvals are obtained and maintained throughout the life of the Project as required by CoA 1.5. No condition of the Project approval removes the obligation for Santos to obtain, renew or comply with such licences, permits or approvals.

3.2. Pipeline licence

A Licence to Construct or Operate a Pipeline (in short, a Pipeline Licence), required under the Pipelines Act and Pipelines Regulation must be issued prior to the commencement of Stage 2 and Stage 3, construction of the pipeline. This EMS will be updated in the event that the pipeline licence lists any specific approval conditions or obligations that are not addressed in the CoA, the CEMP or other management plan required under the CoA.

3.3. EA Statement of Commitments

In section 19 of the EA, and as updated in section 6 of the Response to Submissions Report, Santos has committed to implement a number of environmental management measures. The list of commitments is presented in Table C1 of Appendix C. This table also specifies where each commitment is addressed in this EMS.

Note that not all commitments are applicable to all stages of the Project, with some only applicable to operation of the pipeline.

4. Implementation of the EMS

The environmental management and monitoring for the Project is based on the findings of the environmental assessment process. The key messages with regard to environmental management and monitoring are:

- the existing CoA remain robust enough to ensure that the Project is carried out safely and will not have any significant impacts on people or the environment;
- the EMS will be updated at a minimum, once the alignment has been finalised and prior to the commencement of Stage 2 and Stage 3;
- the management and monitoring framework utilises the principles of adaptive management to ensure continual and timely review of monitoring data, with a continuous improvement or learning feedback loop implemented;
- the environmental management and monitoring process will be subject to audit and reporting requirements; and
- there is public access to a summary of the monitoring results via the Project website.

Santos is committed to conducting activities associated with the Project in an environmentally responsible manner and will implement environmental management in accordance with:

- approval conditions;
- relevant statutory obligations;
- landholder agreements; and
- the findings of the EA.

Santos acknowledges that any CoA requiring the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes notification of incidents with potential for material harm, reporting and response, non-compliance notification, compliance reporting and auditing. Auditing is addressed in section 8.1, as part of compliance reporting.

4.1. Environment, health and safety management system

The Santos Management System (SMS) provides a structured framework for environmental and safety practices across Santos' operations. Among other standards, the framework has been developed to be consistent with AS/NZS ISO 14001:2015 Environmental Management Systems.

The implementation of the SMS will assist in compliance with the suite of management plans and studies to minimise environmental impacts. The SMS documents are in electronic form on the Santos intranet and accessible to all employees.

4.2. Santos Environment, Health and Safety Policy

Santos' corporate environmental commitment is to mitigate the environmental impacts of our operations and activities and to work with communities and partners for positive environmental outcomes. Santos has developed a range of policies to support its vision and values.

The Santos Environment, Health & Safety Policy (EHS Policy) is focussed on eliminating the causes of events that have a high potential for causing harm to people and the environment. A copy of the EHS Policy is presented in Appendix D.

4.3. Environmental management plans, strategies and studies

Santos will stage the preparation and approval of the strategies, plans and studies required by the CoA. The CEMPs for each stage of the Project will be consistent with the *Environmental Management Plan Guideline - Guideline for Infrastructure Projects* (DPIE, 2020), which replaced the 2004 *Guideline for the Preparation of Environmental Management Plans*, published by the former NSW Department of Infrastructure, Planning and Natural Resources (DIPNR).

A list of approved management plans, strategies and studies are included in Table 4.1. All approved plans, strategies and studies will be implemented for the Project.

Table 4.1 - Approved management plans, strategies and studies

| Project Stage | Document Name | Document Number |
|---------------|---|-------------------|
| All Stages | Hunter Gas Pipeline Environmental Management Strategy | 0011-650-PLA-0005 |
| Stage 1 | Stage 1 Preliminary Works Construction Environmental Management Plan, including Contingency Plan (Appendix C) | 0011-650-PLA-0006 |
| | Stage 1 Preliminary Works Construction Noise Management Plan | 0011-650-PLA-0007 |
| | Stage 1 Preliminary Works Construction Traffic Management Plan | 0011-650-PLA-0008 |
| | Stage 1 Preliminary Works Water Management Plan | 0011-650-PLA-0009 |
| Stage 2 | To be developed | - |
| Stage 3 | To be developed | - |

4.4. Roles and Responsibilities

In accordance with CoA 5.1(c), Table 4.2 lists the role, responsibilities, authorities, and accountabilities of key personnel involved in the environmental management of the Project.

Table 4.2 – Positions and key responsibilities

| Position | Key Responsibilities |
|-------------------------------|---|
| Development Manager, NSW / NT | <ul style="list-style-type: none"> Responsible for the overall construction management. Ensures the environmental performance of the Project is consistent with the CoA and the Santos Management System. Responsible for legislative compliance, observation of contractual obligations and the maintenance of resources to achieve the main objectives of the HGP EMS. |
| Construction Manager | <ul style="list-style-type: none"> Ensures all contractors and personnel are appropriately qualified and/or licenced to undertake the scope of work and have a good environmental performance record. Responsible for the development and issuing of construction work packs and instructions to construction work force and for ensuring these are understood. |

| Position | Key Responsibilities |
|--|---|
| | <ul style="list-style-type: none"> Responsible for immediately notifying Environmental Advisor or Team Leader Onshore Environment of any environmental incident, non-compliance or spill. |
| General Manager HSE – EA and PNG | <ul style="list-style-type: none"> Accountable to ensure awareness of the compliance requirements of the HGP EMS and CEMP, including making available appropriate training and inductions. Ensures adequate resources are available to advise on the implementation of the EMS and CEMP. Monitors environmental performance and compliance. |
| Manager for External Affairs – NSW | <ul style="list-style-type: none"> Ensures effective community consultation on project status, project impacts and to receive community feedback. Manages company response to complaints received in accordance with the complaints management procedure. |
| Team Lead – Land Access | <ul style="list-style-type: none"> Ensures effective consultation with affected land owners, infrastructure owners and resource tenement holders. Communicates any land owner complaints / concerns to the Team Lead – NSW Regional for action. Responsible for communicating and monitoring biosecurity protocols on land owner properties. |
| Team Leader - Environment Eastern Queensland and NSW | <ul style="list-style-type: none"> Advises Construction Manager on environmental issues. Oversees the implementation of management plans, protocols and strategies required under the CoA, including environmental inspections and monitoring. Advises on training for relevant employees and contractors of the requirements management plans, protocols and strategies required under the CoA. Prepares and submits statutory reports, reviews and returns. Reviews and updates the environment management documents referred to in this EMS, including providing for continual improvement. Monitors reported non-compliances and completion of follow up actions, and management measures. Notifies the appropriate agencies and departments in the event of a spill or incident, in accordance with the Contingency Plan. |
| Environmental Advisor | <ul style="list-style-type: none"> Advises field staff on environmental issues. Monitors construction activities carried out by the Project that are conducted in accordance with the EHS Policy and the CoA. Promotes environment awareness among Project personnel and contractors. Reports environmental incidents, non-compliances or spills to Team Leader – Onshore Environment. Assists in the investigation and reporting of non-compliances, environmental incidents or complaints. Coordinates the management of records and reporting of environmental monitoring and management data. |
| Construction Supervisor | <ul style="list-style-type: none"> Responsible for ensuring implementation of the EMS and CEMP, including all approved plans and studies, during construction. Communicates the EMS and CEMP compliance requirements as part of the Project construction activities. |

| Position | Key Responsibilities |
|----------------------------------|---|
| | <ul style="list-style-type: none"> • Manage the construction requirements related to all works on the Project site, including plant and equipment. • Report any complaints or possible non-compliance to the Construction Manager and Environmental Adviser at first available opportunity. • Ensures environmental site inspections, monitoring and surveys are undertaken in accordance with the CEMP. |
| All Santos staff and contractors | <ul style="list-style-type: none"> • Complete the relevant induction(s) prior to commencing activities on the Project. • Understand the risks associated with assigned activities and perform tasks in an environmentally responsible manner. • Maintain competencies relevant to the Project activities. • Notify the Construction Supervisor and/or Environmental Advisor of any environmental incidents and exceedances at first possible opportunity. • Undertake all activities in accordance with the EMS, the CEMP and any specific instructions as issued. |

Where relevant, further details regarding the responsibilities for each of the listed positions are provided in the individual management plans listed in Table 4.1.

4.5. Contractor management and local employment opportunities

Contractor workforce and suppliers are engaged and managed in accordance with Santos contractor management standards. These standards outline the process for identification of HSE capabilities, risks and controls when engaging contractors and suppliers for a work scope. Contractors are required to operate in accordance with the Santos Management System, including this EMS. Alternatively, contractors may operate in accordance with their own management systems, provided the systems meet or exceed the Santos standards. For the life of the contract, Santos will monitor contractor performance, including HSE compliance, as per the Santos contract management procedure, through methods such as assurance programs, audits and inspections. Rectification measures will be implemented where necessary should issues be identified. Strategies will be put in place to maximise employment opportunities for local and indigenous workers (e.g. working with local employment and training agencies). As part of working in NSW, Santos will utilise local contractors and suppliers to support operations whenever possible.

4.6. Environmental monitoring requirements

The CEMP and associated management plans and studies are supported by an environmental monitoring program. A comprehensive summary report of the monitoring results on the project in accordance with CoA 5.2 will be prepared annually and published on the Project website. The full suite of monitoring is provided in each of the individual management plans, strategies and studies as relevant to each Project stage. The various monitoring programs will be reviewed prior to the commencement of each stage as part of continuous improvement.

5. Communication

Clear and open lines of communication through and with all levels and functions of the Project including management, staff, contractors and the community is key to minimising environmental impacts and achieving continual improvements in environmental performance. In accordance with CoA 5.2(a), up to date key Project documents will be made available on the Project website from commencement of construction of the Project, including but not limited to:

- the EA and associated documents;
- current statutory approvals for the Project;
- approved studies, strategies and plans required for the Project under the CoA;
- summary of the monitoring results on the Project;
- a summary of complaints received, updated monthly; and
- any other matter required by the Planning Secretary.

As required under CoA 5.2(b) this information will be kept up to date and readily accessible by the community.

5.1. Stakeholder engagement

Stakeholder engagement for the Project will continue throughout the development and execution of each Project stage. Stakeholder engagement is undertaken to facilitate open and transparent communications with all parties with an interest in the Project and/or may be impacted by any stage of the Project. Engagement with directly affected stakeholders will be focussed on finalising the pipeline alignment and discussing the terms and conditions of construction activities and pipeline operations. Pipeline agreements or property leases will be executed with directly affected landowners. These agreements will, as identified through engagement, contain property specific terms of access to land, biosecurity measures, crop control and/or livestock security as well as other required land management practices.

The main identified stakeholder groups for the Project are listed below. Stakeholders will be regularly reviewed and updated.

- State and local governments and agencies;
- directly and indirectly affected landowners;
- Aboriginal stakeholder groups;
- infrastructure owners and operators (e.g. Transport NSW, Essential Energy, Telstra, etc);
- companies and titleholders of mineral, coal and petroleum tenements; and
- community, including environmental interest groups and industry associations.

Stakeholder interactions and outcomes will be recorded in the Santos Stakeholder Relationship Management system or equivalent. Actions for close-out of issues raised during engagement will be assigned to the appropriate Santos staff member.

Stakeholder engagement will also ensure the broader community is able to:

- track the progress of the Project;
- understand potential Project impacts on local communities during construction, such as from noise, dust or traffic;
- raise any post-approval concerns with Santos; and
- make complaints or raise concerns about compliance at any time.

Santos can be contacted directly via the Narrabri shop front at 125 Maitland Street, using the HGP email info@huntergaspipeline.com.au, or on the toll free hotline 1300 427 546.

The HGP website provides up-to-date Project information (www.huntergaspipeline.com.au) with a monthly e-newsletter distributed providing key Project information and updates.

Community drop-in information sessions have been and will continue to be held along the pipeline alignment during Project development and construction. Additional targeted community engagement will be undertaken in affected local communities where required.

5.1.1. Government Liaison Group

In accordance with the SoC C3, Santos will establish a government liaison group (GLG) with relevant government agencies and departments. Santos will provide periodic updates to the GLG on Project progress and other relevant issues as they arise.

6. Incident, non-compliance and emergency response

Incident reporting and non-compliance notification will be in accordance with CoA 4.4 and CoA 4.5 respectively. Santos will notify the DPHI via the Major Projects Portal and in writing to compliance@planning.nsw.gov.au immediately after becoming aware of an incident that causes or is likely to cause material harm to the environment. The notification will identify the Project (including the application number and name) and set out the location and nature of the incident. The following other relevant authorities will also be notified in the following order:

- EPA via the environment line on 131 555
- Ministry of Health via the local Public Health Unit:
 - Tamworth – phone 6764 8000 or 4924 6477 (after hours)
 - Newcastle – phone 1300 066 055 or 4924 6477 (after hours)
- SafeWork NSW – phone 13 10 50
- relevant local government
- Fire and Rescue NSW – phone 1300 729 579 (unless already notified in the case of an emergency via 000).

Within seven days of becoming aware of a non-compliance with the CoA, being a breach of the CoA which does not amount to an 'incident', Santos will notify the DPHI of the non-compliance via the Major Projects Portal and in writing to compliance@planning.nsw.gov.au. This notice will identify the Project (including application number and name) and will set out the non-compliance (including the condition the Project is non-compliant with and the way in which it does not comply), the reasons for the non-compliance (if known) and what actions have been taken, or will be taken, to address the non-compliance. A non-compliance which has been notified as an incident will not be notified as a non-compliance.

Santos will, at the earliest opportunity:

- implement the Contingency Plan as per the CEMP and/or the Emergency Response Plan (ERP) as appropriate based on the nature of the incident. The Contingency Plan provides the management and communication process for events that have the potential to pollute or contaminate surface or ground water;
- take all reasonable and feasible measures to ensure that the incident or non-compliance ceases and does not recur;
- consider all reasonable and feasible options for remediation (where relevant) and submit a report to the DPHI and other required agencies describing those options and any preferred remediation measures or other course of action; and
- implement reasonable requirements as directed by the Planning Secretary, as required by CoA 1.3.

In response to an incident, Santos will also implement the Santos procedure for incident reporting, investigation and learning to:

- classify the incident and raise internal and external notifications;
- record the incident in the Santos Incident Management System;
- initiate investigations based on the incident classification;
- identify and carry out corrective actions as needed and to have these recorded in the Incident Management System.

Incident investigation outcomes will be communicated to relevant management through documented briefings and shared across the organisation via EHS Bulletins, toolbox talks, pre-start meetings and similar forums. If required, strategies, plans or programs will be reviewed and amended in consultation with the relevant agencies, in accordance with CoA 6.5.

7. Complaint management and dispute resolution

7.1. Complaints

Santos has a Complaints Management Procedure that is communicated to all relevant staff members. Complaints can be directed to Santos via phone or email 24 hours a day, 7 days a week. Alternatively, complaints can be made in writing and sent to Santos, or made in person at the Santos Narrabri shopfront. Contact and address details are presented in Appendix E and are publicly available on the Hunter Gas Pipeline project website (www.huntergaspipeline.com.au)

Should a complaint about the project be received directly by Santos via any of the above contact pathways, Santos will:

- Log the complaint on an internal complaint form as soon as practicable, documenting:
 - date and time of the complaint;
 - the method the complaint was received;
 - complainant details; and
 - details of the issue or complaint.
- Advise the responsible manager as soon as possible after the complaint is recorded.
- Contact the complainant to discuss the facts and circumstances of the complaint and to provide an indication of how the matter will be investigated.
- Investigate the complaint and identify actions to address findings as appropriate
- Brief the responsible manager on the proposed actions.
- Issue a written communication to the complainant of the investigation findings
- Update the internal complaints form to log:
 - actions taken to remediate the issue, if any;
 - follow up actions required, if any;
 - details of further liaison with complainant, if any; and
 - closure date and time of the issue.
- Update the online complaint register.

As per CoA 5.2, Santos maintains a complaint register which is updated monthly and will be available on the Project website from the commencement of construction of the Project. The register will document the following details for complaints about the project received directly by Santos:

- date and time the complaint was received;
- the method the complaint was received;
- nature of the complaint (withholding personal details); and
- Action taken, detailing the status and outcome of the complaint (e.g. under investigation / resolved).

7.2. Disputes

If there is a dispute between Santos and a complainant, the party may give written notice to the other party, providing details of the dispute (Dispute Notice).

On delivery of a Dispute Notice by either party, the following procedures will apply:

- a. Santos will use reasonable endeavours to convene a meeting between the parties to discuss the dispute.
- b. If the dispute is not resolved at the meeting mentioned in (a) Santos will engage an independent mediator to review the dispute and provide recommendations to Santos.
- c. In consultation with the complainant, Santos will implement the recommendations of the mediator, unless otherwise agreed with the Planning Secretary (or delegate).

8. Reporting, evaluation and review

8.1. Compliance reporting

Santos will provide regular compliance reporting on the Project in accordance with the relevant Compliance Reporting (DPE, 2020) requirements as required by CoA 4.2. Compliance reporting ensures that:

- the Project's environmental performance in terms of compliance with the CoA is evaluated on the basis of monitoring data and is communicated at various stages during the carrying out of the Project;
- the reporting obligations required by the CoA are met; and
- opportunities for improvement are identified and adopted.

These requirements do not replace the obligation to comply with specific requirements in the CoA. If there is any inconsistency between the requirements of the CoA and the Compliance Reporting requirements, the CoA prevail.

Santos and/or its construction contractor will undertake assurance inspections throughout construction. Assurance inspections will assess the ongoing adequacy and effectiveness of the CEMP and supporting plans and provide a measure of environmental performance. Assurance reports identifying observations and actions during the audit will be created, with follow up reports demonstrating rectification measures for observations made. Reporting on environmental performance will be made available on the Project website as required by CoA 4.3.

8.2. Review and evaluation

As required by CoA 6.5, unless the Planning Secretary agrees otherwise within three months of:

- a. the submission of an incident notification under CoA 4.4;
- b. the approval of any modification of the conditions of approval; or
- c. a direction from the Planning Secretary.

Santos will review and, if necessary, revise the studies, strategies or plans required under the CoA to the satisfaction of the Planning Secretary.

This EMS will be reviewed and, if necessary, updated (at a minimum):

- in accordance with a direction from the Planning Secretary;
- due to a significant change in the environmental management processes and procedures as described in this EMS. If there is ambiguity in relation to whether there is a significant change, Santos will consult with the Planning Secretary to determine whether the EMS will be reviewed; and
- otherwise at intervals of no longer than three years, to reflect the requirement of CoA 6.1.

If the review under CoA 6.5 determines that the studies, strategies or plans required under the CoA require revision then Santos will submit the revised document to the Planning Secretary for approval within four weeks of the completion of the review.

A record of reviews undertaken will be documented in this EMS.

8.3. Improvement measures

Measures to improve the environmental performance of the Project that will be implemented include but are not limited to the following:

- reviewing the implementation of the management controls;
- assess ongoing consistency with the underlying and supporting management plans;
- review of monitoring and inspections data, and any assessment of trends; and
- assessment of performance against the corporate standards, and procedures, including assurance, risk management, incident reporting investigation and learning.

These measures will be taken at least every three (3) years during the operational period of the Project. This is additional to the reviews and reporting carried out in section 8.1. The effectiveness of the Emergency Response Plan is tested at least annually through both desktop and practical exercises.

The results of the review of the individual management plans will be used to report back to the EMS for periodic fine-tuning to ensure that leading practice environmental management is maintained for the Project.

9. Training, awareness and competence

9.1. Environmental induction

Santos will direct its contractors and personnel to carry out the Project in accordance with the CoA, the revised statement of commitments and the CEMP.

Prior to working at Project locations along the pipeline alignment, all personnel and contractors will undertake a site-specific induction covering environmental, cultural, health and safety aspects. This is done to ensure all personnel involved in the Project are aware of the requirements of the EMS, and to ensure the implementation of environmental management measures. Short-term service providers to site for purposes such as deliveries or equipment servicing will be accompanied by inducted personnel at all times.

The Environmental Advisor, Construction Supervisor or their delegate(s) will generally conduct the environmental component of the site inductions for construction activities. The environmental induction will address a range of issues including, but not limited to:

- purpose, scope and objectives of EMS;
- requirements of due diligence and duty of care;
- roles, responsibilities, accountabilities and expectations;
- typical Project environmental hazards and risks, including:
- no-go and exclusion zones;
- locations of sensitive environmental areas; and
- community sensitivities and landholder access restrictions;
- environmental emergency and incident procedures and locations of emergency spill kits; and
- management and reporting process for environmental incidents.

The General Manager HSE – EA and PNG will review and approve the environmental induction program. A record of all environmental inductions will be maintained. The requirements of this Strategy may be reinforced by formal training or other means such as toolbox meetings, pre-shift communications and awareness posters.

9.2. Visitor induction

Visitors to the Project will undergo a visitor induction, which will outline the overarching environmental, health and safety requirements. The nominated Santos contact will be responsible for the actions and conduct of their visitors and will reinforce the Project's environmental requirements.

At all times, visitors will be under the supervision of a fully inducted Santos employee.

9.3. Toolbox talks and pre-start meetings

Toolbox talks will be one method used to raise awareness and educate all personnel on issues related to environmental risks. Discussion of environmental issues will be a standard agenda item on all toolbox talks. From time to time, specific topics will be selected for more detailed and in-depth discussion. For the construction period, toolbox talks will generally be prepared and delivered by the Construction Supervisor or delegate, with assistance from other field personnel, and will cover a range of topics including but not limited to:

- vegetation clearing and protection;

- erosion, sedimentation and soil management;
- noise and air quality management (dust minimisation);
- management of any identified cultural heritage items; and
- emergency procedures.

Daily pre-start meetings with the site workforce will occur during all stages of the Project once construction has commenced, and will generally take place before the commencement of work each day (or shift) or where changes occur during a shift. The pre-start meeting is a tool for informing the workforce of the day's activities. Safe work practices, environmental protection practices, work area restrictions, activities that may affect the works, coordination with other activities, hazards and risks and other information that may be relevant to the day's activities are discussed. During the construction period the Construction Supervisor or their delegate will generally conduct the pre-start meetings.

10. References

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11. Glossary

| Term | Definition ¹ |
|---------------------------------------|--|
| Acid sulphate soils | Soils containing iron sulphides that, when exposed to air, may oxidise and produce sulphuric acid |
| Alignment | The location of the pipeline underground |
| APGA Code | Australian Pipelines and Gas Association's Code of Environmental Practice – Onshore Pipelines |
| Baseline | A starting point used for future comparisons. |
| Blasting | Rock removal through the use of explosive charges |
| Boring | Describes the act of drilling, usually in a horizontal direction |
| Cathodic protection | A system of preventing corrosion that includes the use of direct current induction |
| Department | The NSW Department of Planning, Housing and Infrastructure (DPHI) |
| EA | <p>The Environmental Assessment, titled Queensland Hunter Gas Pipeline Environmental Assessment by Manidis Roberts Pty Ltd, (September 2008), as modified by the:</p> <ul style="list-style-type: none"> • Submissions Report for the Queensland Hunter Gas Pipeline dated November 2008; and • request to modify the approved project, dated 18 October 2018, including the associated Response to Submissions dated 27 December 2018 and Additional Information provided to the Department dated May 2019. |
| Easement | A right legally possessed by the Proponent to use an area that will be designated for the installation and operation of a pipeline |
| Ephemeral | Temporary state or condition in nature; such as wetlands during the wet season. |
| Feasible | Means what is possible and practical in the circumstances |
| Groundwater | Water contained in the interconnected pore spaces and voids of the saturated zone of sediments and rocks. |
| Horizontal directional drilling (HDD) | Drilling a hole at a shallow angle through which a pipe is threaded. Employed in generally silty or gravelly soil conditions, such as under a watercourse. |
| Hydrostatic testing | A method used to identify any leaks within the pipeline |
| Lateral | A smaller diameter sized pipe that extends from the main pipeline to service a particular area or operation. |
| Incident | An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance. |
| Material harm | Material harm to the environment as defined in S.147 of the POEO Act. |

¹ The majority of the definitions are as provided in the Project Approval 06_0286, the EA and the Environmental Management Plan Guideline (DPE, 2020).

| Term | Definition ¹ |
|-----------------------|--|
| Minimise | Implement all reasonable and feasible mitigation measures to reduce the impacts of the Project. |
| Mitigation | Activities or measures associated with reducing the impacts of the Project. |
| Non-conformance | Failure to comply with an environmental requirement, standard, or procedure. |
| Non-compliance | An occurrence and/or set of circumstances that breach the conditions of approval and/or any other legal requirement. |
| Off-take | A potential connection point to the gas pipeline that would enable potential future use of the gas. |
| Stage | A distinct period in the Project schedule (for example early works, construction, operation, decommissioning). |
| Pigging | A special method that utilises either magnetic flux loss or ultrasonic method for the purpose of identifying any defects within the pipeline |
| Planning Secretary | Planning Secretary under the EP&A Act, or nominee |
| Pollution incident | Has the same meaning as in the POEO Act |
| Project | The construction of the Hunter Gas Pipeline in three distinct stages |
| Proponent | Santos Limited |
| Public infrastructure | Linear and related infrastructure that provides services to the general public, such as roads, railways, water supply, drainage, sewerage, gas supply, electricity, telephone, telecommunications, etc. |
| Purging | Describes the process in which air is removed from the pipeline prior to the introduction of gas to ensure safe entry of the gas |
| Reasonable | Means applying judgement in arriving at a decision, considering mitigation benefits, cost of mitigation versus benefits provided, community views and the nature and extent of potential improvements |
| Rehabilitation | The restoration of land disturbed by the Project to ensure it is safe, stable and non-polluting over the short, medium and long term |
| Right of Way (ROW) | The 30 m area required for construction of the pipeline. |
| Study Area | The area 200 m wide for the length of the HGP within which the 30 m right of way is located. |
| Unacceptable risk | The level of risk at which mitigation actions are deemed to be warranted |
| Watercourse | A river, creek or other stream, including a stream in the form of an anabranch or tributary, in which water flows permanently or intermittently, regardless of the frequency of flow events: In a natural channel, whether artificially modified or not, or in an artificial channel that has changed the course of the stream. It also includes weirs, lakes and dams |

Appendix A - Staging approval

Department of Planning and Environment



Our ref: MP06_0286-PA-2

Mr Todd Dunn
Development Manager NSW/NT
Hunter Gas Pipeline Pty Ltd

04/10/2023

Subject: Queensland Hunter Gas Pipeline (MP06_0286) – Approval of Staging Request

Dear Mr Dunn

I refer to your correspondence to the Department of Planning and Environment (Department) dated 19 September 2023, requesting the Planning Secretary's approval to submit required studies, strategies and plans under the Queensland Hunter Gas Pipeline project approval on a staged basis.

The following three stages are proposed:

- o **Stage 1:** construction of temporary laydown yards at multiple strategic locations along the proposed Hunter Gas Pipeline alignment.
- o **Stage 2:** Construction of the Narrabri to Newcastle section of pipeline.
- o **Stage 3:** Construction of the Wallumbilla to Narrabri section of the pipeline.

The Department has carefully reviewed your request and considers that it is consistent with Condition 6.1 the project approval. Accordingly, as nominee of the Planning Secretary, I approve your staging request and the proposed approach to preparation of the relevant plans for Stage 1 as outlined in your correspondence dated 19 September 2023.

Further you are also seeking the Secretary's agreement that some of the project approval requirements would not be required to be undertaken for Stage 1 including:

- o **Condition 2.9** - local council consultation outcomes for off-take points: these would not be relevant to the Stage 1 construction works.
- o **Condition 3.18** – Biodiversity Offset Needs Study: subject to the approval of the Stage 1 Construction Environmental Management Plan (CEMP), demonstrating that there would be no impacts on biodiversity values.
- o **Condition 3.19** – Final Hazard Studies: Stage 1 construction works would not involve the construction or use of gas-related infrastructure or other hazardous infrastructure.

The Department has carefully reviewed your request and accepts that these conditions are not required for Stage 1, subject to demonstrating that there would be no impact on biodiversity values at the locations proposed for the Stage 1 works. Accordingly, as nominee of the Planning Secretary, I agree that

Appendix B - Approval conditions

Table B1 – MP-06_0286 approval conditions

| MP 06_0286 approval conditions | Section reference |
|---|--|
| 1. ADMINISTRATIVE CONDITIONS | |
| Terms of Approval | |
| 1.1 The Proponent shall carry out the project: | |
| generally in accordance with the EA; and | Section 1.2 |
| in accordance with the conditions of approval. | |
| 1.2 In the event of any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of approval shall prevail to the extent of any inconsistency. | Section 1.2 |
| 1.3 The Proponent shall comply with any reasonable requirement(s) of the Planning Secretary arising from the Department's assessment of: | Section 1.2 |
| any documents that are submitted in accordance with this approval; and | |
| the implementation of any actions or measures contained in these documents. | |
| Lapse of Approval | |
| 1.4 This approval will lapse if the Proponent does not physically commence the project by 15 October 2024 | Noted |
| Statutory Requirements | |
| 1.5 The Proponent shall ensure that all licences, permits and approvals are obtained and maintained as required throughout the life of the project. No condition of this approval removes the obligation for the Proponent to obtain, renew or comply with such licences, permits or approvals. | Section 3.1 |
| Structural Adequacy & Standards | |
| 1.6 The Proponent shall ensure that: | |
| all new buildings and structures, any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA; and | Sections 2.2.9 and 2.2.10 |
| the pipeline is constructed in accordance with Australian Standard AS 2885. | Stage 2 CEMP Stage 3 CEMP |
| Demolition | |
| 1.7 The Proponent shall ensure that all demolition work associated with the project is carried out in accordance with Australian Standard AS 2601–2001: <i>The Demolition of Structures</i> , or its latest version. | Section 2.2.10 Stage 2 CEMP Stage 3 CEMP |
| Operation of Plant and Equipment | |
| 1.8 The Proponent shall ensure that all plant and equipment used on the site, or to monitor the performance of the project, is: | Stage 1 CEMP – Section 5.2.4 |
| maintained in a proper and efficient condition; and | Stage 2 CEMP |
| operated in a proper and efficient manner. | Stage 3 CEMP |
| 2. PROJECT DESIGN REQUIREMENTS | |
| Route Alignment | |

| MP 06_0286 approval conditions | Section reference |
|--|--|
| 2.1.1 The Proponent shall submit, as part of the Construction Environmental Management Plan required under condition 6.2, route alignment sheets for the project identifying the final 30- metres Construction Right of Way. The route alignment sheets shall, except as provided below, demonstrate the avoidance of Endangered Ecological Communities. | Stage 2 CEMP Stage 3 CEMP |
| 2.1.2 The route may only be aligned within an Endangered Ecological Community if the Proponent has: demonstrated to the satisfaction of the Planning Secretary, in consultation with the BCS, that there will only be minimal impacts; and provision has been made for biodiversity offsets, consistent with condition 3.18 of this Approval. | Stage 2 CEMP Stage 3 CEMP |
| 2.2 The Proponent shall consult with all landowners potentially affected by the final 30-metres Construction Right of Way during the preparation of the route alignment sheets. | Section 5.1 |
| 2.3 During the process of finalising the route alignment, the Proponent shall ensure consultation with relevant companies and titleholders of mineral and petroleum resource licences in relation to the potential for conflict between the route of the project and current and future resource exploration and extraction activities. The consultation shall aim to resolve any identified potential conflict where practicable. | Section 5.1 |
| 2.4 The route alignment of the project shall be within the corridor identified in the documents referred to in condition 1.1. Any deviations in route alignment outside this corridor shall only occur for the purpose of: reducing impacts to biodiversity, cultural heritage or human amenity; avoiding geological or topographical constraints, providing the deviations do not increase impacts to those areas referred to under a); and after consultation with potentially affected landholders and relevant agencies | Section 1.1.2 |
| Watercourse Crossings | |
| 2.5 The Proponent shall prepare, in accordance with APGA <i>Code of Environmental Practice – Onshore Pipelines</i> and the <i>Guidelines for Controlled Activities on Waterfront Land</i> (NRAR, 2018), or their latest versions, site-specific watercourse crossings and details of associated methods of construction. These documents shall be submitted for the endorsement of the NRAR prior to the submission of the Construction Environmental Management Plan required under condition 6.2. The Construction Environmental Management Plan shall include: a copy of the NRAR's endorsement(s) of the documents required under this condition; details of the duration and timing of works associated with watercourse crossings; details of the measures that would be implemented to avoid or minimise impacts of the project on riparian and aquatic habitats in and around the water crossings In preparing the documents required under this condition, the Proponent shall consult with the relevant Local Land Services with regard to watercourse crossing methodologies and site- specific mitigation measures for watercourses. | Sections 2.2.1 and 2.2.5 Stage 2 CEMP Stage 3 CEMP |

| MP 06_0286 approval conditions | Section reference |
|--|---|
| <p>2.6 The project shall avoid any disturbance to, or crossing of, wetlands mapped under <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>². Where the project route lies within 100 metres of a mapped Resilience and Hazards SEPP wetland, an appropriate buffer around these wetlands shall be defined and illustrated in the Construction Environmental Management Plan required under condition 6.2, to ensure no adverse effects to the wetland result from the project.</p> | <p>Stage 2 CEMP Stage 3 CEMP</p> |
| <p>2.7 The Proponent shall, where practicable, avoid temporary watercourse crossings for heavy machinery.</p> | <p>Stage 2 CEMP Stage 3 CEMP</p> |
| <p>2.8 The Proponent shall consult with NSW Fisheries in relation to any temporary infrastructure or works in and around watercourses that may result in the blockage of fish passage.</p> | <p>Stage 2 CEMP Stage 3 CEMP</p> |
| <p>Provision of Off-take Points for Current and Future use</p> | |
| <p>2.9 The Proponent shall provide off-take points (valves) to enable the project to service the following areas:</p> <p>Narrabri and Boggabri;</p> <p>Gunnedah;</p> <p>Quirindi;</p> <p>Murrurundi, Scone and Aberdeen; and</p> <p>Port Stephens.</p> | <p>Section 1.1.2</p> |
| <p>The Proponent shall consult with the relevant local council in identifying locations for off-take points referred to under this condition and in relation to any requirements for servicing relevant areas. The outcomes of this consultation shall be provided to the Department prior to the commencement of construction of the relevant part of the project, unless otherwise agreed by the Planning Secretary.</p> | |
| <p>Pipeline Construction</p> | |
| <p>2.10 The project shall be constructed in accordance with the <i>APGA Code of Environmental Practice – Onshore Pipelines</i>.</p> | <p>Section 2.2.1</p> |
| <p>3. SPECIFIC ENVIRONMENTAL CONDITIONS</p> | |
| <p>Noise Impacts - Construction Noise</p> | |
| <p>3.1 The Proponent shall only undertake construction activities associated with the project, other than blasting, that would generate an audible noise at any residential or sensitive receiver during the following hours:</p> <p>7:00 am to 6:00 pm, Mondays to Fridays, inclusive;</p> <p>8:00 am to 1:00 pm on Saturdays; and</p> <p>at no time on Sundays or public holidays.</p> | <p>Stage 1 CEMP – Section 2.2.3 Stage 2 CEMP Stage 3 CEMP</p> |

² The State Environmental Planning Policy (Coastal Management) 2018 was repealed and superseded by the State Environmental Planning Policy (Resilience and Hazards) 2021, which commenced on 1 March 2022.

| MP 06_0286 approval conditions | Section reference |
|---|---|
| <p>Subject to the Planning Secretary's approval of the Construction Environmental Management Plan (under condition 6.2), construction activities may occur outside these hours (for example a 28 day construction, 9 day respite construction schedule approach).</p> <p>This condition does not apply in the event of a direction from police or other relevant authority for safety reasons, or to avoid immediate environmental harm.</p> <p>NOTE: the 28-day on/ 9-day off cycle is generally accepted as appropriate construction hours, however it is important that recognition is given to noise sensitive areas and an alternative schedule be developed for these areas through the Construction Environmental Management Plan.</p> | <p>Stage 1 CEMP – Section 2.2.3</p> <p>Stage 2 CEMP</p> <p>Stage 3 CEMP</p> |
| Noise Impacts - Construction Blasting | |
| <p>3.2 Blasting associated with the construction of the project shall only be undertaken during the following hours:</p> | <p>Stage 2 CEMP</p> <p>Stage 3 CEMP</p> |
| <p>a) 9:00 am to 5:00 pm, Mondays to Fridays, inclusive;</p> | |
| <p>b) 9:00 am to 5:00 pm on Saturdays; and</p> | |
| <p>c) at no time on Sundays or public holidays</p> | |
| <p>3.3 The Proponent shall ensure that air blast overpressure generated by blasting associated with the project does not exceed the criteria specified in Table 1 [of the CoA] when measured at the most affected residential or sensitive receiver.</p> | <p>Stage 2 CEMP</p> |
| <p>3.4 The Proponent shall ensure that the ground vibration generated by blasting associated with the project does not exceed the criteria specified in Table 2 [of the CoA] when measured at the most affected residential or sensitive receiver.</p> | <p>Stage 3 CEMP</p> |
| <p>3.5 Prior to each blasting event, the Proponent shall notify the relevant local council and potentially-affected landowners, including details of time and location of the blasting event and providing a contact point for inquiries and complaints.</p> | <p>Stage 2 CEMP</p> |
| Air Quality Impacts | |
| <p>3.6 The Proponent shall construct the project in a manner that minimises dust emissions from the site, including wind-blown and traffic-generated dust. All activities on the site shall be undertaken with the objective of preventing visible emissions of dust from the site. Should such visible dust emissions occur at any time, the Proponent shall identify and implement all practicable dust mitigation measures, including cessation of relevant works, as appropriate, such that emissions of visible dust cease.</p> | <p>Stage 1 CEMP – Section 5.2.4</p> <p>Stage 2 CEMP</p> <p>Stage 3 CEMP</p> |
| <p>3.7 The Proponent shall not permit any offensive odour, as defined under section 129 of the <i>Protection of the Environment Operations Act 1997</i>, to be emitted beyond the boundary of the site.</p> | <p>Stage 1 CEMP – Section 5.2.4 and 5.2.9</p> <p>Stage 2 CEMP</p> <p>Stage 3 CEMP</p> |
| Traffic and Transport Impacts | |
| <p>3.8 Where directional drilling/boring is proposed under roads or where trenching is proposed to cross roads or where trenching is proposed to occur within the road reserve in close proximity to the road pavement, the Proponent shall obtain consent under Section 138 of the <i>Roads Act 1993</i> for any such works. The following information must be provided to these authorities, prior to the commencement of construction, when seeking consent:</p> | <p>Stage 2 CEMP</p> <p>Stage 3 CEMP</p> |
| <p>detailed plans of the pipeline including vertical and horizontal alignment;</p> | |
| <p>plant and equipment proposed to be used and construction compound locations;</p> | |

| MP 06_0286 approval conditions | Section reference |
|---|--|
| construction schedule and hours of construction; | |
| mitigation measures proposed to reduce impacts to traffic and pedestrian safety; and | |
| indicative maintenance arrangements during operation. | |
| 3.9 The Proponent shall ensure that any measures to restore or reinstate roads affected by the project are undertaken in a timely manner, in accordance with the requirements and to the satisfaction of the relevant road authority, including the Crown Lands and at the full expense of the Proponent. | Stage 1 CEMP – Appendix E CTMP – Section 5.2 Stage 2 CEMP Stage 3 CEMP |
| 3.10 The Proponent shall ensure that all crossings of the council-maintained roads are constructed using construction methods and depth of cover determined in consultation with the relevant local council. | Stage 2 CEMP Stage 3 CEMP |
| Existing Infrastructure and Resources | |
| 3.11 The Proponent shall undertake all reasonable and feasible measures to minimise the impact of the project on all existing infrastructure in the vicinity of the project route. The Proponent shall consult with the appropriate owner of such infrastructure with regard to measures to mitigate or manage any potential impact. The Proponent shall bear the cost of repairing or relocating any infrastructure directly impacted or damaged as a result of the project. | Section 5 |
| 3.12 The Proponent shall consult with Gunnedah Shire Council regarding any existing leases and access/occupation rights that may exist within the Pullaming Stock Route, in order to determine and manage any potential impacts to this area from the installation and ongoing maintenance of the project. | Sections 1.4 and 5.1 |
| 3.13 Prior to the commencement of relevant construction works, the Proponent shall consult with holders of mineral, mining and coal tenements with respect to measures to be applied during construction and operation of the project so as to minimise the potential for any sterilisation of resources on the tenement. This must include, but is not limited to, Namoi Valley Coal Pty Limited ³ , the owner of mining tenements CL 316 and AUTH 406 and Muswellbrook Coal Company Ltd, the owner of coal tenements AUTH 176 and ML 1304. | Section 5.1 |
| 3.14 Prior to the commencement of construction, the Proponent shall consult with each landholder, whose property is directly impacted by the project, the terms and conditions relating to construction activities on their land, including: | Section 5.1 |
| access to land; | |
| measures to control spread of weeds, genetically modified organisms and methods to ensure security of livestock on the land during construction; and | |
| acquiring of necessary easements, including terms of the easement agreement and compensation to the landowner for the proposed easement on their land | |
| Ecological Impacts | |
| 3.15 The Proponent shall: | |
| a) submit, as part of the Construction Environmental Management Plan required under condition 6.2, a study of the potential impacts from the construction of the project on potential koala habitat; | a) Stage 2 CEMP and Stage 3 CEMP b) Stage 2 CEMP |

³ Mining tenement CL316 and AUTH 406 are now owned by Whitehaven Coal Limited.

| MP 06_0286 approval conditions | Section reference |
|--|---|
| <p>b) monitor open trench areas for any fauna and any sightings of fauna shall be actively managed to minimise actual and potential impacts on those species. Any fauna found in the open trench shall be recorded and managed in consultation with BCS; and</p> <p>c) for a period of two years after construction (or as otherwise required by the Planning Secretary) monitor the areas along the project alignment, after construction is complete, for weed infestation and any infestations shall be actively managed to remove or minimise the spread of infestations</p> | <p>and Stage 3 CEMP</p> <p>c) Stage 1 CEMP – Section 5.2.1, Stage 2 CEMP and Stage 3 CEMP</p> |
| <p>3.16 Clearing of native vegetation shall be limited to the minimal extent practicable required for the construction of the project. This shall be achieved by both location of the pipeline in previously cleared areas where possible, and where clearing cannot be avoided a minimal width clearing corridor.</p> | <p>Stage 2 CEMP</p> <p>Stage 3 CEMP</p> |
| <p>3.17 The construction activities of the pipeline shall not disrupt to the extent practicable, the previous vegetation rehabilitation works conducted by the Kooragang Wetland Rehabilitation Project and Hunter Bird Observers Club, on the western part of Kooragang Island (also referred to as Ash Island).</p> | <p>Stage 2 CEMP</p> <p>Stage 3 CEMP</p> |
| <p>3.18 The Proponent shall develop and submit for the approval of the Secretary, a Biodiversity Offset Needs Study. The study shall be developed in consultation with BCS and shall include a methodology for determining biodiversity offset requirements</p> | <p>Refer to the Biodiversity Offset Needs Study</p> |
| Hazards and Risk | |
| <p>3.19 Prior to the commencement of the construction of the project, unless the Secretary agrees otherwise, the Proponent shall prepare a Final Hazard Analysis (FHA) of the project to the satisfaction of the Secretary.</p> | <p>Refer to the FHA.</p> |
| <p>3.20 Prior to the commencement of the operation of the project, the Proponent shall submit to the Department a copy of the Pipeline Management Plan required for the project under the <i>Pipelines Regulation 2013</i>.</p> | <p>Noted</p> |
| Soil and Water Quality Impacts | |
| <p>3.21 Except as may be expressively provided by an Environment Protection Licence for the project, the Proponent shall comply with section 120 of the Protection of the Environment Operations Act 1997 which prohibits the pollution of waters.</p> | <p>No EPL required for the Project.</p> |
| <p>3.22 Soil and water management controls shall be employed to minimise soil erosion and the discharge of sediment and other pollutants to lands and/or waters during construction activities, in accordance with <i>Managing Urban Stormwater: Soils and construction</i> (DECC, 2008), or its latest version.</p> | <p>Stage 1 CEMP – Appendix F WMP – Section 5.1</p> |
| <p>3.23 The Proponent shall prepare a contingency plan for events that have the potential to pollute or contaminate surface or ground water. The plan is to include threshold levels, remediation actions and communication strategies for the effective management of such an event. This plan is to be included in the Construction Environmental Management Plan required under condition 6.2.</p> | <p>Stage 1 CEMP – Appendix C Contingency Plan</p> <p>Stage 2 CEMP</p> <p>Stage 3 CEMP</p> |
| <p>3.24 The Proponent shall notify the relevant local council should contaminated soil be uncovered during excavation works. The Construction Environmental Management Plan required under condition 6.2 shall include management measures for any contamination that may be uncovered during construction of the project</p> | <p>Stage 1 CEMP – Section 5.2.10</p> <p>Stage 2 CEMP</p> <p>Stage 3 CEMP</p> |

| MP 06_0286 approval conditions | Section reference |
|---|---|
| 3.25 Proponent shall ensure that all water supplies for construction, hydro-testing and operation are sourced from an authorised and reliable supply. | Stage 1 CEMP – Section 2.2.5 Stage 2 CEMP Stage 3 CEMP |
| 3.26 Any Acid Sulphate Soils encountered during construction of the project shall be treated and disposed of in accordance with the <i>Acid Sulphate Soils Manual</i> (Acid Sulphate Soil Management Advisory Committee, 1998) or its latest version | Section 2.2.8 |
| Heritage Impacts | |
| 3.27 The Proponent shall prepare an oral histories study for determining significant Aboriginal heritage significant sites along the potential route. The study shall be informed by the views of the Traditional Owners and appropriate Aboriginal community. The Construction Environmental Management Plan (condition 6.2) protocols adopted in relation to avoidance, constraints and mitigation measures shall be informed by the oral histories. The results of this study shall be used to assist in the determination of the final project right of way (refer to condition 2.1.1). | Stage 1 CEMP – Section 5.2.5 Stage 2 CEMP Stage 3 CEMP |
| 3.28 If during the course of any ground fieldwork assessment, the Proponent uncovers any significant Aboriginal heritage sites, the Proponent shall consult Heritage NSW with regard to an appropriate course of action for the management of these sites. | |
| 3.29 If during the course of construction the Proponent becomes aware of any previously unidentified significant Aboriginal object(s), all work likely to affect the object(s) shall cease immediately and Heritage NSW informed in accordance with the <i>National Parks and Wildlife Act 1974</i> (NSW). Relevant works shall not recommence until written authorisation from Heritage NSW advising otherwise is received by the Proponent. | |
| Crown Lands Easement | |
| 3.30 The Proponent shall liaise with the Crown Lands and negotiate measures to be applied during construction and operation of the project so as to minimise the potential for any impact to the environment on Crown lands. | Section 1.4 |
| 3.31 The Proponent shall ensure the provision of long term access management measures, such as fences, gates and barriers to be installed at all pipeline entry points on Crown Land to minimise the opportunity of utility easements being utilised for illegal rubbish dumping, illegal trail bike riding, damaging 4WD use and bushfire ignition points. | |
| Waste Generation and Management | |
| 3.32 All waste materials removed from the site shall only be directed to a waste management facility lawfully permitted to accept the materials. | Stage 1 CEMP – Section 5.2.9 |
| 3.33 The Proponent shall maximise the treatment, reuse and/ or recycling on the site of any waste oils, excavated soils, slurries, dusts and sludges associated with the project, to minimise the need for treatment or disposal of those materials outside the site. | Stage 2 CEMP Stage 3 CEMP |
| 3.34 The Proponent shall not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997, if such a licence is required in relation to that waste. | |

| MP 06_0286 approval conditions | Section reference |
|---|-------------------|
| 3.35 The Proponent shall ensure that all liquid and / or non-liquid waste generated and / or stored on the site is assessed and managed in accordance with the relevant NSW Waste Classification Guidelines (EPA, 2014), or their latest versions. | |
| 4. COMPLIANCE NOTIFICATIONS AND REPORTING | |
| Notification – Date of Commencement | |
| 4.1 The Proponent shall notify the Department in writing of the date of commencement of: | Section 1.1.2 |
| any stage of construction of the project; | |
| the commissioning of the pipeline; and | |
| the operation of the pipeline. | |
| Compliance Reporting | |
| 4.2 The Proponent shall provide regular compliance reporting on the project as required by the Department and in accordance with the relevant <i>Compliance Reporting</i> (DPE 2018) requirements. | Section 8.1 |
| Regular Reporting | |
| 4.3 The Proponent shall provide regular reporting on the environmental performance of the project on its website in accordance with the reporting requirements in any strategies or plans approved under the conditions of approval. | Section 8.1 |
| Incident Notification | |
| 4.4 The Department shall be notified in writing to compliance@planning.nsw.gov.au immediately after the Proponent becomes aware of an incident. The notification must identify the project (including the application number and name of the project) and set out the location and nature of the incident. | Section 6 |
| Non-Compliance Notification | |
| 4.5 The Department shall be notified in writing to compliance@planning.nsw.gov.au within 7 days after the Proponent becomes aware of any non-compliance with the conditions of this approval. The notification must identify the project (including the application number and name of the project), set out the condition of approval that the project is non-compliant with, the way in which it does not comply, the reasons for the non-compliance (if known) and what actions have been taken, or will be, undertaken to address the non-compliance. | Section 6 |
| 5. COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT | |
| Environmental Management Strategy | |
| 5.1 Prior to the commencement of the construction of the project, the Proponent shall prepare an Environmental Management Strategy for the project to the satisfaction of the Planning Secretary. This strategy must: | This document |
| provide the strategic framework for the environmental management of the project; | Section 4.1 |
| identify the statutory approvals that apply to the project; | Section 3 |
| describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project; and | Section 4.4 |
| describe the procedures that would be implemented to: | |
| <ul style="list-style-type: none"> keep the local community and relevant agencies informed about the progress of the project; | Section 5 |

| MP 06_0286 approval conditions | Section reference |
|---|--|
| <ul style="list-style-type: none"> receive, handle, respond to, record and report complaints; | Section 7 |
| <ul style="list-style-type: none"> resolve any disputes that may arise during the project; | Section 7 |
| <ul style="list-style-type: none"> respond to any non-compliance; and | Section 6 |
| <ul style="list-style-type: none"> respond to any incidents or emergencies. | Section 6 |
| Access to Information | |
| 5.2 From the commencement of the construction of the project, the Proponent shall: | Section 5 |
| make copies of the following information publicly available on its website: | |
| <ul style="list-style-type: none"> the EA; | |
| <ul style="list-style-type: none"> current statutory approvals for the project; | |
| <ul style="list-style-type: none"> approved studies, strategies and plans required for the project under the conditions of approval; | |
| <ul style="list-style-type: none"> a comprehensive summary of the monitoring results on the project, reported in accordance with the requirements in the conditions of approval or any approved studies, strategies or plans for the project; | |
| <ul style="list-style-type: none"> a summary of any complaints received, updated monthly; | |
| <ul style="list-style-type: none"> any other matter required by the Planning Secretary; and | |
| keep this information up to date. | |
| 6. ENVIRONMENTAL MONITORING AND MANAGEMENT | |
| Updating & Staging of Studies, Strategies & Plans | |
| <p>6.1 To ensure the studies, strategies and plans for the project are updated on a regular basis and incorporate any required measures to improve the environmental performance of the project, the Proponent may submit revised studies, strategies or plans required for the project under the conditions of approval at any time. With the agreement of the Planning Secretary, the Proponent may also submit any study, strategy or plan required under the conditions of this approval on a staged basis</p> | Section 1.1.2 Section 8.2 |
| <p>The Planning Secretary may approve a revised strategy or plan required under the conditions of approval, or the stage submission of these documents, at any time. With the approval of the Planning Secretary, the Proponent may prepare the revised or staged strategy or plan without undertaking consultation with all parties nominated under the applicable condition in this approval.</p> | |
| <p>Notes:</p> <ul style="list-style-type: none"> While any study, strategy or plan may be submitted on a progressive basis, the Proponent will need to ensure that the existing operations on site are covered by suitable studies, strategies or plans at all times. If the submission of any study, strategy or plan is to be staged, then the relevant study, strategy or plan must clearly describe the specific stage to which the study, strategy or plan applies, the relationship of this stage to any future stages, and the trigger for updating the study, strategy or plan. | |
| Construction Environmental Management Plan | |
| <p>6.2. Prior to the commencement of the construction of the project, the Proponent shall prepare a Construction Environmental Management Plan (CEMP) for the project to the satisfaction of the Planning Secretary.</p> | Stage 1 CEMP Stage 2 CEMP Stage 3 CEMP |

| MP 06_0286 approval conditions | Section reference |
|---|---|
| 6.3 The Construction Environmental Management Plan required under condition 6.2 must include: | |
| a Construction Noise Management Plan | Stage 1 CEMP – Appendix D Noise Management Plan, Appendix E Traffic Management Plan and Appendix F Water Management Plan Stage 2 CEMP Stage 3 CEMP |
| a Construction Traffic Management Plan | |
| a Water Management Plan | |
| Operation Environmental Management Plan | |
| 6.4 Prior to the commencement of the operation of the project, the Proponent shall prepare an Operation Environmental Management Plan (OEMP) to the satisfaction of the Planning Secretary. This plan must outline the environmental management practices and procedures to be followed during the operation of the project. The OEMP shall be consistent with Guideline for the Preparation of Environmental Management Plans (DIPNR 2004), or its latest version ⁴ , and shall include, but not necessarily be limited to: | Refer to the OEMP |
| identification of all relevant statutory and other obligations that the Proponent is required to fulfil in relation to operation of the project, including all relevant approvals, licences, approvals and consultations; | Refer to the OEMP |
| details of the areas designated for the erection of public information signage in accordance with AS 2885; | |
| details of the monitoring methods of rehabilitated areas; | |
| specific consideration of relevant measures to address any requirements identified in the documents referred to under conditions 1.1a) of this approval; | |
| details control measures for soil erosion and sedimentation; | |
| overall environmental policies and principles to be applied to the operation of the project; | |
| relevant standards and performance measures to be applied to the project, and a means by which environmental performance can be periodically reviewed and improved, where appropriate; | |
| management policies to ensure that environmental performance goals are met and to comply with the conditions of this approval; | |
| measures to ensure that relevant ambient air criteria will be met for operational activities, including gas venting; | |
| measures to minimise the operational noise impacts of the project and ensure it complies with the relevant noise criterion specified in the Noise Policy for Industry (EPA 2017), or its latest version; and | |
| management measures for easement areas, including management of vegetation, soil erosion, weed control and landholder liaison. | |

⁴ The OEMP will be consistent with the Environmental Management Plan Guideline. Guideline for Infrastructure Projects (DPE, 2020), which replaced the 2004 Guideline for the Preparation of Environmental Management Plans, published by the former NSW Department of Infrastructure, Planning and Natural Resources.

| MP 06_0286 approval conditions | Section reference |
|---|-------------------|
| The Proponent shall implement the approved OEMP for the project. | Refer to the OEMP |
| Revision of Strategies, Plans and Programs | |
| 6.5 Within 3 months, unless the Planning Secretary agrees otherwise, of: | Section 8.2 |
| the submission of an incident notification under condition 4.4 above; | |
| the approval of any modification to the conditions of approval; or | |
| a direction from the Planning Secretary under condition 1.3 | |
| <p>the Proponent shall review and, if necessary, revise the studies, strategies or plans required under the conditions of approval to the satisfaction of the Planning Secretary.</p> <p>Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Planning Secretary for approval</p> | |

Appendix C - EA Statement of Commitments

Table C1 – EA Statement of Commitments

| Reference | Objective | Commitment | Timing / stage | Plan / section reference |
|-----------------------------|--|--|--|--|
| Proposal overall | | | | |
| P1 | Ensure sound environmental management of the proposal. | Pipeline construction and management of environmental aspects of the pipeline construction and operation will be guided by the APGA Code | Prior to and during construction, and during operation | Section 2.2.1 Stage 1 CEMP Section 1.2 and 5.2 Stage 2 CEMP Stage 3 CEMP |
| P2 | Ensure objectives of adaptive management are met. | Each construction spread will have a qualified manager designated with responsibility for ensuring that the objectives of adaptive management and the SoCs are met. | Prior to and during construction | Section 4 |
| Pipeline route finalisation | | | | |
| R1 | Ensure final alignment minimises impacts on natural and built environment. | Final route alignment will be carefully selected by applying the route selection process, objectives and criteria described in Chapter 3 of the EA. | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| R2 | | Any alignment changes outside of the Study Area will be subject to a consistency assessment, informed through a desktop assessment of each of the environmental issues identified by applying the same methodology used in this EA. Any potentially significant impacts identified will be investigated and managed. | Prior to construction | |
| R3 | | Where any final alignment changes outside of the Study Area are significantly inconsistent with the Part 3A approval of the proposal, the proponent will apply for modification under section 75W of the EP&A Act. Note 1 | Prior to construction | |
| R4 | Continue to inform stakeholders of the progress of alignment refinement and finalisation | A copy of the finalised pipeline route (scale of 1:140,000 A4) will be made available to DoP, DWE, DECC, DPI, DoL 5and relevant stakeholders. | Prior to construction | |
| R5 | | Landholders directly affected at any future stage of the route refinement will be formally notified by letter of the finalised pipeline route. | Prior to construction | |
| Construction management | | | | |
| CM1 | Management systems in place for protection of environment. | A CEMP will be developed in consultation with DECC, DPI, DWE, DoL and relevant CMAs to manage environmental issues assessed and implement identified mitigation and management measures where required. | Prior to construction | Stage 1 CEMP Section 1.6 Stage 2 CEMP Stage 3 CEMP |
| CM1A | | The proponent will direct its contractors to carry out the Project in accordance with the conditions of approval, the revised statement of commitments and the CEMP. | During construction | Section 9.1 |
| CM2 | Minimise impacts associated with the location and operation of temporary construction camps, storage and depots. | Construction camps, pipeline storage areas and vehicle depots will be located in accordance with the criteria set out in Chapter 5. | Prior to and during construction | Stage 1 CEMP Section 2.1 Stage 2 CEMP Stage 3 CEMP |

⁵ Contemporary Government Departments and agencies are the Department of Primary Industries (DPI) Fisheries, DPI Agriculture, Department of Planning and Environment (DPE) Water, Heritage NSW, DPE: Biodiversity, Conservation and Sciences Directorate (BCS), Crown Lands, Local Land Services and Office of Energy and Climate Change

| Reference | Objective | Commitment | Timing / stage | Plan / section reference |
|---|---|--|--|---|
| CM3 | Minimise impacts on human amenity as a result of construction hours. | Construction works would be undertaken between 7am and 6pm, seven days a week for 28 days and then nine days off, except in the following instances where extended construction hours may occur when: <ul style="list-style-type: none"> HDD drill rig is in operation until completion of the HDD bore (continuity of process required); Boring is in operation until completion of the boring; Water filling and hydro-testing of the pipeline is underway (continuity of process required); Extenuating circumstances out of the control of the project (such as weather, industrial relations) result in delays to the pipeline program, notice would be given to the Planning Secretary with an outline of proposed work hours and schedule; Works do not pose an audible disturbance to any residences; Transport of plant, equipment and pipe by oversized trucks outside of hours as required by authorities for safety reasons; It is required in an emergency to avoid injury or loss of life, property and/or to prevent environmental harm; Agreement is reached with local residents in order to reduce the duration of construction activities and/or manage other traffic, amenity or disturbance issues. | During construction | Stage 1 CEMP Section 2.2.3 Stage 2 CEMP Stage 3 CEMP |
| CM4 | Minimise impacts on human amenity as a result of construction hours. | Where construction noise is audible at the major level at sensitive receivers, consultation with impacted residents will be undertaken 48 hours in advance of work and during the local construction period as necessary. The level of major audibility at sensitive receivers is 50dBA at isolated residences and 55dBA at township residences. | During construction | Stage 1 CEMP - Appendix D - Section 5.4 and 7.2 Stage 2 CEMP Stage 3 CEMP |
| CM5 | | Blasting will be scheduled to 9am to 5pm Monday to Saturday. No blasting will be scheduled for Sundays or public holidays. | During construction | Stage 2 CEMP Stage 3 CEMP |
| CM6 | Minimise impact of trenching operations. | Construction spreads will endeavour to minimise the length of open trench by using staged construction methods and forward planning. | During construction | Stage 2 CEMP Stage 3 CEMP |
| CM7 | Management systems in place for protection of workers and the public. | A Safety Management Plan will be prepared consistent with the requirements of AS 2885. | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| Community and stakeholder consultation | | | | |
| C1 | Ensure effective and receptive consultation with community and other stakeholders is continued. | An integrated stakeholder consultation process will continue to be implemented throughout the project. The outcomes of ongoing consultation will continue to influence the project. | Prior to and during construction, and during operation | Section 5 |
| C2 | Ensure responsiveness to issues and concerns raised by the community. | A 24-hour toll free contact telephone number will be established. A system to receive, record, track and respond to issues and concerns will be implemented. | Prior to and during construction | Section 7 |
| C3 | Ensure liaison with key government stakeholders | The proponent will establish a framework for a government liaison group (GLG) to liaise with DECC, DPI, DWE and DoP, DoL and relevant CMAs. | Prior to and during construction | Section 5.1.1 |
| Biodiversity | | | | |
| B1 | Minimise impacts to riparian vegetation | Measures will be implemented to prevent and/or minimise harm to riparian vegetation that may result from construction and/or operation of the pipeline. Crossing points will be selected to minimise the extent of riparian vegetation clearing and limited to the narrowest area practicable. | During construction | Stage 2 CEMP Stage 3 CEMP |

| Reference | Objective | Commitment | Timing / stage | Plan / section reference |
|-----------|--|--|-----------------------------------|--|
| B2 | Minimise native vegetation disturbance. | Equipment storage areas and stockpile areas will be located away from riparian zones within existing cleared or degraded lands. | During construction | Stage 1 CEMP section 5.2.1 Stage 2 CEMP Stage 3 CEMP |
| B2A | | Where feasible, the ROW will be aligned adjacent to complementary infrastructure to ensure minimal impacts on native vegetation and habitat relative to approved projects at that location. | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| B2B | | In specified areas, construction activities would operate in a reduced ROW of not more than 20m. | During construction | Stage 2 CEMP Stage 3 CEMP |
| B2C | | In specified areas, and in consultation with an ecologist, construction activities would ensure mature native trees are avoided. | During construction | Stage 1 CEMP Section 5.2.1 Stage 2 CEMP Stage 3 CEMP |
| B2D | | In specified areas, and where consistent with DECC guidelines, strategies will be developed for re-using vegetation that has been removed from the ROW in rehabilitation works. | During construction | Stage 2 CEMP Stage 3 CEMP |
| B2E | | In specified areas, stands of threatened flora will be cordoned off and avoided during construction. | During construction | Stage 2 CEMP Stage 3 CEMP |
| B3 | Minimise impacts to threatened reptiles | Construction timing will be developed in consideration of avoiding relevant sensitivities in the lifecycle of these species, including breeding times, following outcomes of identified fieldwork. | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| B4 | | Where identified potential habitat exists in the final ROW, a herpetologist will inspect the potential habitat prior to construction. Individuals, if found in the ROW, will be relocated to adjacent suitable habitat outside of the ROW. | During construction | Stage 2 CEMP Stage 3 CEMP |
| B5 | Minimise the spread and/or establishment of weeds. | Weed management measures will be developed for incorporation into the CEMP, taking into consideration: <ul style="list-style-type: none"> A review of relevant desktop information relating to relevant noxious and environmental weed listings. Results of biodiversity fieldwork. Liaison with landowners regarding any locally occurring weed management issues or existing management arrangements. | Prior to construction | Stage 1 CEMP section 5.2.1 Stage 2 CEMP Stage 3 CEMP |
| B6 | | Any excavated material containing weeds will not be stored near waterways or existing stands of native vegetation. | During construction | Stage 1 CEMP section 5.2.1 Stage 2 CEMP Stage 3 CEMP |
| B7 | | Noxious weeds in areas disturbed by construction activities will be managed for a minimum of two years post completion. | During operation | Stage 1 CEMP section 5.2.1 Stage 2 CEMP Stage 3 CEMP |
| B8 | Minimise impacts to hollow dependent and other fauna in woodland areas | In those areas identified by survey as sensitive woodland areas for nesting fauna species, an ecologist will check hollow bearing trees prior to clearing in the ROW. Fauna found nesting will be relocated to suitable adjacent habitat. | During construction | Stage 2 CEMP Stage 3 CEMP |
| B9 | | Stands of vegetation in the ROW containing hollow bearing trees will be cleared using a two stage clearing process with adjacent non-hollow bearing trees to be cleared first. | During construction | |
| B10 | | Logs, dead trees, and other habitat features will be relocated from the area of clearing to provide habitat in adjacent areas where feasible and practical during construction. Habitat features will be reinstated within the ROW, following construction. | During construction and operation | |
| B11 | | In those areas where hollow bearing trees have been removed, and in consultation with an ecologist, nest boxes (as necessary) will be fixed to suitable retained vegetation, in a way that does not damage the tree. | During construction and operation | |

| Reference | Objective | Commitment | Timing / stage | Plan / section reference |
|----------------------------|--|---|----------------------------------|------------------------------|
| B12 | Minimise impacts to native fauna species. | Designated personnel will survey the open construction trench ahead of construction works daily. Any trapped fauna species will be relocated. Additional measures to protect fauna during construction, including the provision of fauna refuges will be further explored. | During construction | Stage 2 CEMP Stage 3 CEMP |
| B13 | Minimise impacts to aquatic habitat and fish species during crossing of identified sensitive waterways | Watercourse crossings for all sensitive waterways will be designed so as not to preclude fish passage, where necessary in consultation with the DPI. | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| B13A | | Coarse woody debris and other in stream habitat features will be relocated from the area of construction, and reinstated in stream, following construction. | During construction | |
| B14 | Minimise biodiversity impacts from operation of the proposal. | Operations and maintenance staff will be informed of the importance of any reinstated habitat to ensure that it is not removed as part of operational activities | During operation | Stage 2 CEMP Stage 3 CEMP |
| B15 | Minimise impacts to woodland bird species. | In areas identified as potential movement corridors for avifauna, and in consultation with an ecologist, the following mitigation measures will be implemented: <ul style="list-style-type: none"> Reduction in the width of the ROW as necessary. Site-specific revegetation and management plans to ensure that the route is restored as far as practicable to its original state. Construction timing that is sympathetic to the lifecycle sensitivities of the relevant species identified through fieldwork surveys. | During construction | Stage 2 CEMP Stage 3 CEMP |
| B16 | Minimise impacts to Green and Golden Bell Frog, wetland bird species. | Specific measures will be developed to minimise potential impacts to Green and Golden Bell Frogs and wetland bird species, which will include: <ul style="list-style-type: none"> Specialist advice from a herpetologist and wetland ecologist on construction methodology, and the implementation of relevant Chytrid Fungus controls. Advice gained from liaison with the local CMA, and local representatives of DECC's Parks and Wildlife Group. Maintenance of existing water quality. Construction during winter months, and specifically outside of the Green and Golden Bell Frog breeding season of September to February. | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| B17 | Minimise impacts related to the spread of Cinnamon Fungus and Chytrid Fungus. | Investigate management measures to minimise the spread of Cinnamon Fungus and Chytrid Fungus, taking into consideration: <ul style="list-style-type: none"> The outcomes of a risk assessment conducted to determine areas of the ROW where risk of the disease may be high. Advice gained from liaison with DECC and other relevant government agencies. Current available initiatives relating to hygiene, and chemical or other control mechanisms. | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| B18 | Adaptively manage residual biodiversity constraints in accordance with precautionary principles | In constraint areas where spring fieldwork was precluded from lack of access permission, fieldwork will be carried out to determine applicable management measures that may be required. These measures would be developed using the existing framework in Chapter 4 [of the EA]. | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| B19 | Prevent the spread of Cane Toads (Bufo marinus) from known areas of infestation. | Specific measures will be developed to ensure that Cane Toads (Bufo marinus) are not transported away from known infestation areas by construction plant or equipment. | During construction | Stage 2 CEMP Stage 3 CEMP |
| Aboriginal heritage | | | | |
| AH1 | Minimise impacts to known sites of high significance (categorised as high impact sites). | The ROW has been aligned to avoid the following four sites based on the outcomes of an archaeological survey with elders: <ul style="list-style-type: none"> Euraba Mission Aboriginal Ceremony and Dreaming. Euraba Mission Burial. Euraba Whalan Creek Modified (Carved or Scarred) Tree Wallalong Brush Conflict site | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| AH1A | | The ROW will be aligned to avoid the Gil Gil Creek scarred tree once the outcomes of an archaeological survey with Aboriginal knowledge holders is known. | Prior to and during construction | |

| Reference | Objective | Commitment | Timing / stage | Plan / section reference |
|---------------------|---|--|----------------------------------|---|
| AH2 | Minimise potential for accidental impact on sites of low to moderate significance (categorised as low to moderate impact sites) | Site types and sites categorised as low to moderate impact, where identified during pre construction surveys, conducted by a qualified archaeologist with assistance from representatives of relevant registered Aboriginal stakeholders will be managed in accordance with the measures indicated in Tables 10.4 and Table 10.5 [in the EA]. | Prior to and during construction | Stage 1 CEMP Section 5.2.5 Stage 2 CEMP Stage 3 CEMP |
| AH3 | | All personnel and contractors working on site will receive training in their responsibilities under the National Parks and Wildlife Act 1974 as part of an Aboriginal heritage induction program. Additional site specific training will be given to workers when working within identified sensitive zones, as per the predictive model. | During construction | |
| AH4 | | A mechanism will be developed to provide for the management of impacts to artefact scatters above a given density. This mechanism will: <ul style="list-style-type: none">State thresholds when works in the immediate vicinity will stop.Identify relevant project personnel with authority to stop works in the immediate vicinity when the prescribed threshold is reached.Include provision for verification of significance of the find by the project archaeologist or similar.Provide a framework for the resolution and management of the find, seeking input from relevant Aboriginal groups, and the DECC [now DCCEEW]. | Prior to construction | |
| AH5 | Minimise impact to other items of high significance. | Should any items or sites of high significance, including Aboriginal human remains, not previously identified be uncovered during construction, all works in the immediate vicinity of the find will cease. A mechanism will be developed to manage this contingency. Works will not recommence in the areas until appropriate clearance is given; specialist advice will be sought as necessary. | During construction | Stage 1 CEMP Section 5.2.5 Stage 2 CEMP Stage 3 CEMP |
| AH6 | Conserving high significance sites. | The strategic approach described in Chapter 10 [of the EA] for identification of potential high significance sites through oral research with traditional knowledge holders will be completed and identified constraints mapped on alignment sheets in order that identified high significance sites can be avoided in the ROW alignment. The proponent will provide a copy of the research on a confidential basis to DECC and DoP and describe how the proposal has responded to these findings within the existing framework presented in Chapter 10 [of the EA]. | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| AH7 | Contributing to understanding of indigenous cultural heritage values. | In relation to impacts on artefact scatters below the threshold identified in AH4, the proponent, in consultation with relevant registered local Aboriginal stakeholders, will develop a program to undertake, within the 30 m ROW in each of the five bioregions, one strategic research project to determine cultural heritage significance and provide the outcomes of the research to the local Aboriginal stakeholders consulted in a form to be agreed. | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| Historical heritage | | | | |
| HH1 | Minimise impacts on known hard and moderate historical heritage constraints. | Use the heritage assessment to inform the final alignment of the ROW. | Prior to construction | Stage 1 CEMP Section 5.2.2 Stage 2 CEMP Stage 3 CEMP |
| HH2 | | Maintain consultation with the Heritage Branch of DoP [now Heritage NSW], local councils and other relevant agencies and stakeholders. | Prior to and during construction | Sections 1.4 and 5.1 |
| HH3 | | Include relevant known heritage constraints in the CEMP. | Prior to and during construction | Stage 1 CEMP Section 5.2.2 Stage 2 CEMP Stage 3 CEMP |
| HH4 | Minimise impacts on potential hard and moderate historical heritage constraints | Identify and avoid within the ROW potential hard and moderate heritage constraints. | Prior to and during construction | Stage 2 CEMP Stage 3 CEMP |
| HH5 | | Maintain consultation with the Heritage Branch of DoP [now Heritage NSW], local councils and other relevant agencies and stakeholders. | Prior to and during construction | Sections 1.4 and 5.1 |
| HH6 | | Include relevant potential heritage constraints in the CEMP. | Prior to and during construction | Stage 1 CEMP Section 5.2.2 Stage 2 CEMP Stage 3 CEMP |
| Noise and vibration | | | | |

| Reference | Objective | Commitment | Timing / stage | Plan / section reference |
|------------------------------|--|---|--|--|
| N1 | Minimise the impact of construction and operation noise and vibration on surrounding residents and property. | Construction noise and vibration management strategies will be outlined in the CEMP. Construction and operation measures will include: Liaising with community to advise on likely timing and duration of noisy activities. • Resolving complaints received from residents and landowners. • Using noise abatement measures where reasonable and feasible. | During construction and during operation | Section 5.1 Stage 1 CEMP - Appendix D CNMP - Section 7.1 and 7.2 Stage 2 CEMP Stage 3 CEMP |
| N2 | Minimise impacts of blasting. | Blasting will be carried out in accordance with Australian Standard AS 2187. | During construction | Stage 2 CEMP Stage 3 CEMP |
| N3 | Minimise the impact of construction and operation noise and vibration on surrounding residents. | Following route finalisation, any potential major noise impacts will be identified and if required specific localised mitigation measures will be developed in consultation with local residents and stakeholders. | Prior to and during construction | Stage 2 CEMP Stage 3 CEMP |
| N4 | Minimise the impact of blasting. | Blasting areas will be identified and management procedures defined in the CEMP in accordance with AS 2187. | Prior to and during construction | Stage 2 CEMP Stage 3 CEMP |
| Traffic and transport | | | | |
| T1 | Minimise impact on road networks. | Preparation of crossing plans in consultation with the appropriate road authority. | During construction | Stage 2 CEMP Stage 3 CEMP |
| T2 | | Any oversized or overweight loads will be transported in accordance with RTA [now TfNSW] requirements. | During construction | Stage 1 CEMP - Appendix E CTMP - Section 5.2 Stage 2 CEMP Stage 3 CEMP |
| T3 | Minimise impacts on human receptors and local traffic networks. | Specific localised traffic impacts will be assessed following the determination of the location of construction camps, pipeline storage areas, vehicle depots and ROW access points. If there are significant impacts identified, then specific transport arrangements associated with pipe transport and storage and construction vehicle movements will be developed to minimise localised impacts on other road users. | Prior to and during construction | Stage 1 CEMP - Appendix E CTMP - Section 2.1 Stage 2 CEMP Stage 3 CEMP |
| Air quality | | | | |
| A1 | Minimise reduction in air quality from dust and particulate matter. | Working practices will be managed to minimise nuisance dust. | During construction | Stage 1 CEMP - Section 5.2.4 Stage 2 CEMP Stage 3 CEMP |
| A2 | | Blasting will be conducted at appropriate times, with consideration of site conditions and sensitive receivers. | During construction | Stage 2 CEMP Stage 3 CEMP |
| A3 | | The burning of material on site will be prohibited, except under the instruction of fire services. | During construction | Stage 1 CEMP - Section 5.2.4 Stage 2 CEMP Stage 3 CEMP |

| Reference | Objective | Commitment | Timing / stage | Plan / section reference |
|--------------------------|---|--|-----------------------|--|
| A4 | | Vehicles will be maintained to ensure emissions are kept to the minimum practicable. | During construction | Stage 1 CEMP - Section 5.2.4 Stage 2 CEMP Stage 3 CEMP |
| A5 | Containment of gas within the pipeline. | Regular maintenance checks will be undertaken and a leak detection system will be installed. | Operation | Stage 2 OEMP Stage 3 OEMP |
| Socio-economic | | | | |
| SE1 | Minimise adverse social and economic impacts of access to private property. | Final route selection across private properties will be conducted in consultation with landowners to minimise impacts during construction and operation of the pipeline. | Prior to construction | Section 5.1 |
| SE2 | Minimise impact of pipeline easement on landowners. | The proponent will continue negotiations with landowners regarding location of easement, aboveground infrastructure and compensation and terms and conditions of consent. | Prior to construction | Section 5.1 |
| SE3 | Create employment opportunities. | Strategies will be put in place to maximise employment opportunities for local and indigenous workers (e.g. working with local employment and training agencies). | Prior to construction | Section 4.5 |
| Land use planning | | | | |
| L1 | Minimise land use conflicts. | The detailed pipeline alignment will continue to be refined to avoid land use conflicts, particularly in relation to existing and proposed urban settlements, extractive industries, environmentally sensitive land uses. | Prior to construction | Stage 1 CEMP - Section 2.1 Stage 2 CEMP Stage 3 CEMP |
| L2 | | Construction scheduling will be mindful of avoiding seasonal constraints associated with existing land use activities. | During construction | Stage 2 CEMP Stage 3 CEMP |
| L3 | Minimise impacts to agricultural activities. | The proponent will endeavour to negotiate with each landowner terms and conditions relating to construction activities on their land, which may include: <ul style="list-style-type: none"> • Access; • Weed management; • Crop control in relation to genetically modified organisms (GMO); and • Livestock security. | Prior to construction | Section 5.1 |
| L4 | To avoid adverse impacts on known areas of mine subsidence and to ensure that engineering design is cognisant of relevant constraints | Further consultation will be undertaken with the Mine Subsidence Board and the DPI Minerals in order to continue to review proposed mine expansions that may impact the pipeline. | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| L4A | To resolve potential conflicts between possible coal resource extraction and the pipeline alignment. | Further consultation will be undertaken with DPI Coal Advice in order to continue to review possible future developments of coal bearing strata (in particular, in the area southwest of Scone), that may impact the pipeline. | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| L5 | To avoid land use conflicts. | Further review and route refinements to avoid potential land use conflicts in relation to: <ul style="list-style-type: none"> • Ardglenn Quarry expansion; • Muswellbrook's new LEP; and • Maitland Urban Settlement. | Prior to construction | Stage 2 CEMP |

| Reference | Objective | Commitment | Timing / stage | Plan / section reference |
|-------------------------|---|--|--|---|
| L6 | Access to Crown Lands | Once the route is finalised the proponent will consult with DoL regarding Crown Lands traversed by the pipeline. Easements will be acquired pursuant to the Pipelines Act 1967 (NSW) which provides for notice of the proposed easement to be provided to DoL [now LLS]. For any areas of temporary occupation of Crown Lands outside the easement a licence will be obtained under the Crown Lands Act 1989 (NSW). Note 2 | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| Hazards and risks | | | | |
| H1 | Minimise the risk of incidents during construction and operation. | The pipeline will be aligned, designed and operated in accordance with AS 2885, DoP [now DPHI] risk criteria, and required safety management systems. | Prior to and during construction, and during operation | Stage 2 CEMP Stage 3 CEMP |
| H2 | | The qualitative and quantitative risk assessments will be updated during the design phase. | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| H3 | | The management measures developed in the Safety Management System will be compared to the Pipeline Research Council International protocols for assessing Stress Corrosion Cracking risk. | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| H4 | | The HAZOP study and revised safety analysis will be completed, in accordance with AS 2885. | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| Surface and groundwater | | | | |
| W1 | Adopt appropriate water crossing technique. | The proponent will engage with DECC, DPI and DWE and relevant CMAs with regard to crossing methods and site specific management measures for high sensitivity watercourse crossings. | During construction | Stage 2 CEMP Stage 3 CEMP |
| W1A | | Site-specific watercourse crossing methods will be prepared in accordance with the APGA CoEP and in consultation with DWE prior to commencement of construction of that crossing. | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| W2 | Minimise changes in waterway channel or bank form. | The proponent will implement all practicable measures to limit impacts on watercourses and channels during construction of the pipeline. Measures to be implemented will be guided by industry and government guidelines and policies. | During construction | Stage 2 CEMP Stage 3 CEMP |
| W3 | Minimise pollution of surface or groundwater. | Soil and water management measures will be implemented during the construction phase through the CEMP. Management measures will be prepared in accordance with Managing Urban Stormwater: Soils and Construction (Landcom, 2004) as appropriate to pipeline construction. | During construction | Stage 1 CEMP - Appendix F WMP - Section 5.1 Stage 2 CEMP Stage 3 CEMP |
| W3A | | A contingency plan will be prepared for events that have the potential to pollute or contaminate surface or groundwater sources. The plan will include threshold levels, remediation actions (including monitoring) and communication strategies. | Prior to construction | Stage 1 CEMP – Appendix C Contingency Plan Stage 2 CEMP Stage 3 CEMP |
| W4 | | Trenches will be compacted and reinstated in such a way as to compensate for settling of backfill. Where crowns are used, crown breaks will be created at regular intervals and at drainage lines to permit continued surface water flows and prevent scouring along the trench or ponding. | During construction | Stage 2 CEMP Stage 3 CEMP |
| W5 | | A spill response procedure, addressing fuels, lubricants and other chemicals will be outlined in the CEMP. | During construction | Stage 1 CEMP – 5.2.10 and Appendix C Contingency Plan Stage 2 CEMP Stage 3 CEMP |
| W6 | Minimise changes to existing surface and groundwater regimes. | The proponent will implement all practicable measures to limit potential impacts on existing surface and groundwater regimes and this will be documented in the CEMP. | During construction | Stage 1 CEMP - Appendix F WMP Stage 2 CEMP Stage 3 CEMP |

| Reference | Objective | Commitment | Timing / stage | Plan / section reference |
|-------------------------------|---|--|-----------------------|---|
| W7 | Minimise impacts on water quality and geomorphology. | HDD will be used for the crossing of the Hunter River in the Tomago area. | During construction | Stage 2 CEMP |
| W8 | | Where practicable watercourses will be crossed when they are dry. | During construction | Stage 2 CEMP Stage 3 CEMP |
| W9 | Minimise the risk of pollution of surface and groundwater and adverse impact on surface and groundwater bodies. | Any water extraction required for the proposal, will be in accordance with the relevant Water Sharing Plan and water legislation. | During construction | Stage 2 CEMP Stage 3 CEMP |
| W10 | Minimise potential impacts on surface and groundwater. | Further assessment will be undertaken on watercourses identified as being of high sensitivity to finalise crossing locations, methods and site specific management measures. | During construction | Stage 2 CEMP Stage 3 CEMP |
| W11 | | The DPI, DWE and DECC will be consulted on waterway crossing methods and mitigation measures employed for high sensitivity waterways. A profile of the waterway crossing would be provided to DPI, DWE and DECC. | During construction | Stage 2 CEMP Stage 3 CEMP |
| W12 | | If identified by the relevant landholder, the location of unregistered nearby groundwater bores will be mapped and the pipeline route will avoid these bores. | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| Infrastructure | | | | |
| I1 | Minimise adverse impacts on other infrastructure during construction and operation. | Stakeholder engagement with infrastructure owners and managers will be ongoing to ensure their requirements for crossings and works in the general vicinity of their infrastructure are implemented during construction and operation. | Prior to construction | Section 5.1 |
| I2 | Coordinate multiple infrastructure and service impacts. | A collaborative management approach involving the relevant infrastructure owners/managers will be ongoing to coordinate management measures in areas where multiple infrastructure services are affected. | Prior to construction | Section 5.1 |
| I3 | Minimise impacts on the pipeline and utilities and infrastructure during maintenance. | Cooperative management approach will be developed with utility or infrastructure providers for maintenance and access arrangements. | | Stage 2 CEMP Stage 3 CEMP |
| Resource and waste management | | | | |
| RM1 | Ensure waste generated is managed appropriately. | Waste materials will be classified and managed in accordance with the Waste Classification Guidelines (EPA, 2014). | During construction | Stage 1 CEMP – Section 5.2.9 Stage 2 CEMP Stage 3 CEMP |
| RM2 | Minimise impacts on water resources, erosion and water quality as a result of hydrostatic testing | Appropriate water sources for construction activities including hydro-testing will be investigated and identified. Relevant irrigation groups, water users/owners and DWE will be consulted. Where licensing of surface or groundwater extraction is required for the identified water sources, the proponent will obtain the relevant licence or exemption from DWE | Prior to construction | Stage 1 CEMP - Appendix F WMP - Section 5.3 Stage 2 CEMP Stage 3 CEMP |
| RM3 | | Prior to the commencement of hydro-testing activities, a hydrostatic testing program/procedure will be prepared. This will include measures to address: <ul style="list-style-type: none">Confirming quantity of water extraction.Preventing/minimising temporary depletion of water resources due to water extraction for hydrostatic testingErosion at site of hydro-test water discharge.Changes to water quality of receiving water environment | Prior to construction | Stage 2 CEMP Stage 3 CEMP |

| Reference | Objective | Commitment | Timing / stage | Plan / section reference |
|--------------------------|--|--|----------------------------------|---|
| Contaminated land | | | | |
| CL1 | No significant harm to human health and environment from excavation in contaminated sites. | Management measures will be prepared as part of the CEMP to outline procedures to review site conditions including potential contaminants and where necessary, outline measures to ensure appropriate action will be undertaken during construction to avoid any potential impacts to the environment or human health. | During construction | Stage 1 CEMP - Section 5.2.10 Stage 2 CEMP Stage 3 CEMP |
| CL2 | Contamination resulting from accidental spills. | Site environmental management measures will be developed and outlined in the CEMP with the purpose of minimising the potential for spills to occur and implementing remedial actions. | During construction | Stage 1 CEMP - Section 5.2.7 & Appendix C Contingency Plan Stage 2 CEMP Stage 3 CEMP |
| Soils and geology | | | | |
| S1 | Manage soils. | Soil types will be identified and delineated along the alignment. | Prior to construction | Stage 1 CEMP - Appendix F WMP - Section 4.4 Stage 2 CEMP Stage 3 CEMP |
| S2 | | Soil management measures will be developed according to soil type and be documented in the CEMP. | Prior to and during construction | Stage 1 CEMP - Appendix F WMP - Section 5.1 Stage 2 CEMP Stage 3 CEMP |
| S3 | Expansive soils. | The depth of expansive soils will be identified and where practicable the pipe installed below the depth of expansive soils. | During construction | Stage 2 CEMP Stage 3 CEMP |
| S4 | Minimise loss of topsoil. | Erosion and sediment management controls will be prepared as part of the CEMP to manage and minimise erosion and control sediment impacts associated with the construction of the pipeline. | During construction | Stage 1 CEMP - Appendix F WMP - Section 5.1 Stage 2 CEMP Stage 3 CEMP |
| S4A Note 3 | Prevent rising groundwater and salinity. | The proponent will implement all practicable measures to limit any impact the construction and operation of the pipeline may have on rising groundwater and salinity (e.g. avoid building on the side of hills and extra depth of cover where possible). | During construction | Stage 2 CEMP Stage 3 CEMP |
| S5 | Minimise impacts of acid sulfate soil. | Options to vegetate the ROW with saline tolerant vegetation would be investigated in consultation with DECC and landholders, where appropriate. | Operation | Stage 2 CEMP Stage 3 CEMP |
| S6 | | Acid sulfate soil management measures will be prepared as part of the CEMP in accordance with relevant industry practice guidelines and procedures. | During construction | Stage 2 CEMP Stage 3 CEMP |
| S7 | Minimise impacts to soil. | A targeted geotechnical investigation will be undertaken to map soil constraints. | Prior to construction | Stage 2 CEMP Stage 3 CEMP |
| Visual amenity | | | | |
| V1 | Maintain visual amenity along the ROW. | Areas that are visually sensitive will be identified in the CEMP and revegetation carried out in accordance with the APGA CoEP. | Operation | Stage 2 CEMP Stage 3 CEMP |

| Reference | Objective | Commitment | Timing / stage | Plan / section reference |
|---|--|--|-------------------------------------|--|
| V2 | Maintain visual amenity in the vicinity of aboveground ancillary infrastructure. | Visual amenity will be taken into consideration in the detailed design and location of aboveground infrastructure facilities. | Prior to construction and Operation | Stage 2 CEMP Stage 3 CEMP OEMP |
| Greenhouse gas emissions | | | | |
| GG1 | Minimise exhaust emissions from transportation and production. | Adequate planning and maintenance to ensure efficient use of vehicles. | During construction | Stage 1 CEMP – Section 5.2.4 Stage 2 CEMP Stage 3 CEMP |
| GG2 | Minimise gas leaks. | Continuous monitoring system to detect leaks and a maintenance program to minimise fugitive emissions. | Operation | Stage 2 OEMP Stage 3 OEMP |
| GG3 | Minimise gas releases. | Practicable measures will be implemented to minimise planned releases for maintenance work. | Operation | Stage 2 OEMP Stage 3 OEMP |
| GG4 | | Pipeline maintenance and safety measures (e.g. signage) to minimise the risk of accidental gas releases. | Operation | Stage 2 OEMP Stage 3 OEMP |
| Adaptive management of environmental controls | | | | |
| AM1 | Minimise serious or irreversible environmental damage. | Further refinement of the pipeline alignment will seek to improve environmental outcomes through avoidance of relevant constraints, and as necessary the mitigation of any additional adverse impacts. | Prior to construction | Sections 1.1.2 and 5 |
| AM2 | Ensure adaptive management of environmental constraints. | The proponent will carry out the fieldwork referred to in Table 18.1 [in Part C of the EA] | Prior to and during construction | Stage 2 CEMP Stage 3 CEMP |

Notes:

1. The Part 3A assessment system was repealed in October 2011, and was replaced by the State significant development (SSD) and State significant infrastructure (SSI) assessment systems.

2. The *Crown Lands Act 1989* was repealed by Schedule 8a(a) to the *Crown Land Management Act 2016* with effect from 1 July 2018.

3. Reference S4 was duplicated in the revised SoC table in Section 6 of the Response to Submissions. It has been renumbered here as reference S4A.

Appendix D - Santos Environment, Health & Safety Policy

Environment, Health & Safety



Policy

Our Commitment

Santos is committed to being the safest gas company wherever we have a presence and preventing harm to people and the environment

Our Actions

We will:

1. Integrate environment, health and safety management requirements into the way we work
2. Comply with all relevant environmental, health and safety laws and continuously improve our management systems
3. Include environmental, health and safety considerations in business planning, decision making and asset management processes
4. Identify, control and monitor risks that have the potential for harm to people and the environment, so far as is reasonably practicable
5. Report, investigate and learn from our incidents
6. Consult and communicate with, and promote the participation of all workers to maintain a strong environment, health and safety culture
7. Empower our people, regardless of position, to "Stop the Job" when they feel it necessary to prevent harm to themselves, others or the environment
8. Work proactively and collaboratively with our stakeholders and the communities in which we operate
9. Set, measure, review and monitor objectives and targets to demonstrate proactive processes are in place to reduce the risk of harm to people and the environment
10. Report publicly on our environmental, health and safety performance

Governance

The Environment Health Safety and Sustainability Committee is responsible for reviewing the effectiveness of this policy.

This policy will be reviewed at appropriate intervals and revised when necessary to keep it current.

Kevin Gallagher
Managing Director & CEO

Status: APPROVED

| | | | |
|-----------------|--------------------------------------|----------|---|
| Document Owner: | David Banks, Chief Operating Officer | | |
| Approved by: | The Board | Version: | 3 |

15 August 2022

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Appendix E - HGP complaints line contact details

Complaints line

Santos takes complaints in relation to the conduct of our operations very seriously.

Hunter Gas Pipeline Project related complaints may be submitted to:

Telephone (business hours): [1300 427 546](tel:1300427546)

Operations On-Call/Emergency: [0427 923 401](tel:0427923401)

Free call number: [1800 071 278](tel:1800071278)

Email: info@huntergaspipeline.com.au

Postal Address:

Hunter Gas pipeline Pty Ltd

PO Box 859

NARRABRI NSW 2390

Street Address:

Hunter Gas Pipeline Pty Ltd

Narrabri Shopfront

125/6 Maitland Street

NARRABRI NSW 2390