



DBNGP Stage 5 Looping Expansion Project

2012 Annual Environmental Compliance
Report (Statement No. 735)

DRAFT

Prepared for
DBNGP (WA) Nominees Pty Ltd
by Strategen

February 2013

DBNGP Stage 5 Looping Expansion Project

2012 Annual Environmental Compliance
Report (Statement No. 735)

DRAFT

Strategen is a trading name of
Strategen Environmental Consultants Pty Ltd
Level 2, 322 Hay Street Subiaco WA
ACN: 056 190 419

February 2013

Disclaimer and Limitation

This report has been prepared for the exclusive use of DBNGP (WA) Nominees Pty Ltd, in accordance with the agreement between DBNGP (WA) Nominees Pty Ltd and Strategen (“Agreement”). The purpose of the report is to document an environmental compliance audit undertaken by Strategen for DBNGP (WA) Nominees Pty Ltd to satisfy Conditions 4–1 to 4–4 of Statement No. 735 issued under the provisions of Part IV of the Environmental Protection Act 1986.

Strategen accepts no liability or responsibility whatsoever for it in respect of any use of or reliance upon this report by any person who is not a party to the Agreement.

In particular, it should be noted that this report is a qualitative assessment only, based on the scope of services defined by DBNGP (WA) Nominees Pty Ltd, budgetary and time constraints imposed by DBNGP (WA) Nominees Pty Ltd, the information supplied by DBNGP (WA) Nominees Pty Ltd (and its agents), and the method consistent with the preceding.

Where practicable to do so, Strategen has attempted to verify the accuracy and completeness of the information supplied by DBNGP (WA) Nominees Pty Ltd. Where it has not been possible to independently verify information, Strategen has reached conclusions, using its best professional judgement, based on the information provided.

Copyright and any other Intellectual Property arising from the report and the provision of the services in accordance with the Agreement belongs exclusively to Strategen unless otherwise agreed.

This document may not be reproduced or disclosed to any person other than DBNGP (WA) Nominees Pty Ltd for any purpose other than that stated above, without the express written authority of Strategen.

Client: DBNGP (WA) Nominees Pty Ltd

Report Version	Revision No.	Purpose	Strategen author/reviewer	Submitted to Client	
				Form	Date
Draft Report	Rev A	Client Review	C Ellis/ H Ventriss	Electronic	18 Feb 2013
Final Report	Rev 0	Issue for Use	C Ellis/ H Ventriss	Electronic	21 Feb 2013

Table of contents

1. INTRODUCTION	1
1.1 The proposal	1
1.2 Environmental approval	3
2. Audit methodology	4
2.1 Audit plan	4
2.1.1 Purpose and scope	4
2.1.2 Methodology	5
2.2 Audit terminology	6
3. STATE OF PROPOSAL IMPLEMENTATION	8
4. Audit results	9
4.1 Compliance with Statement No 735 conditions	9
4.2 Conformance with Key Actions	9
4.3 Corrective actions	9
5. AUDIT TABLES	10
5.1 Statement No. 735 Summary Audit Tables	10
6. Statement regarding compliance	23
7. References	24

List of tables

Table 1.1	Key characteristics of the Stage 5 Looping Expansion	2
Table 2.1	Persons consulted during audits	5
Table 2.2	Action implementation status	7
Table 3.1	Progress of DBNGP Stage 5 Looping Expansion Project	8
Table 5.1	Results of audit of Statement No. 735	11

1. INTRODUCTION

The Dampier to Bunbury Natural Gas Pipeline (DBNGP) Stage 5 Looping Expansion project involves construction of eleven pipeline loops adjacent (and connected) to the existing DBNGP. Completion of the expansion will result ultimately in completion of duplication of the pipeline from Dampier to Wagerup. The key characteristics of the proposal are presented in Table 1.1. The Stage 5 Looping Expansion project, which continues from Stage 4 (completed in 2006), involves a total length of approximately 1270 km of pipeline.

The proposal for the Stage 5 Looping Expansion was approved for implementation under Part IV of the *Environmental Protection Act 1986* with issue of Statement No. 735 (the Statement) on 13 December 2006. DBNGP (WA) Nominees Pty Limited, trading as Dampier Bunbury Pipeline (DBP), is the Proponent of the DBNGP Stage 5 Expansion project.

The Statement requires submission of an annual compliance report to address the status and compliance of the DBNGP Stage 5 Looping Expansion project with Statement conditions and key actions in accordance with the annual compliance reporting requirements of Conditions 4–1 to 4–4 of the Statement.

Implementation of the Stage 5 project commenced in February 2007, and is being undertaken in three stages. The first stage (Stage 5A) was completed in March 2008. Stage 5B commenced in January 2009 and was effectively completed in early 2010, with the exception of the crossing of the Fortescue River. The Fortescue River Crossing section was undertaken over the period August 2011 to December 2011 inclusive. WestNet Energy (previously Alinta Asset Management) was contracted by DBP to provide project management for Stages 5A and 5B of the DBNGP Looping Expansion Project. DBP undertook project management of the Fortescue River crossing.

The anniversary date for submission of compliance reports is 13 December each year. This report has been prepared to demonstrate compliance with the Statement conditions for the period from 14 December 2011 to 13 December 2012 inclusive. The report comprises the findings of an audit of compliance with:

- conditions and procedures contained within the Statement as required by Condition 4–3(2) of the Statement
- key actions contained within management plans or programs as required by Conditions 4–3(4) of the Statement.

As Stage 5A of the proposal was completed in March 2008 and Stage 5B was completed in November 2011, no construction activities were conducted during the reporting period 14 December 2011 to 13 December 2012.

1.1 The proposal

Table 1.1 presents the key characteristics of the proposal as presented in the environmental impact assessment report (Strategen 2006). There has been no change to the proposal since issue of the Statement.

DBNGP (WA) Nominees Pty Limited trading as Dampier Bunbury Pipeline (DBP) remains the Proponent of the DBNGP Stage 5 Looping Expansion project and there has been no change in responsibility for proponentcy.

Table 1.1 Key characteristics of the Stage 5 Looping Expansion

Aspect	Proposal			
Location	There will be eleven loops. The first loop starts at about 2 km south of Dampier. The last loop is south of compressor station 10, which starts at about 17 km southeast of Rockingham, and ends at Wagerup West (Main Line Valve 144).			
Proposed action	Construct eleven pipeline looping lengths of 660 mm in diameter, buried adjacent to the existing DBNGP. These pipeline lengths will be looped to the existing DBNGP to increase flow of natural gas.			
Total length of looping	Approximately 1270 km			
Characteristics of each loop	No.	Approx. length	Biogeographical region	Shires
	0	137.2 km	Pilbara	Shire of Roebourne
	1	123.3 km	Pilbara	Shire of Ashburton
	2	104.9 km	Carnarvon, Gascoyne	Shire of Ashburton
	3	113.0 km	Carnarvon, Gascoyne	Shire of Carnarvon
	4	112.9 km	Carnarvon	Shire of Carnarvon, Shire of Upper Gascoyne
	5	119.0 km	Carnarvon, Yalgoo	Shire of Shark Bay
	6	131.0 km	Yalgoo, Geraldton Sandplains	Shire of Northampton, Shire of Chapman Valley, Shire of Mullewa
	7	142.4 km	Geraldton Sandplains	Shire of Mullewa, Shire of Irwin, Shire of Carnamah
	8	96.8 km	Geraldton Sandplains, Swan Coastal Plain	Shire of Coorow, Shire of Dandaragan, Shire of Gingin
	9	127.7 km	Swan Coastal Plain	Shire of Gingin, Shire of Chittering, City of Swan, City of Belmont, Shire of Kalamunda, City of Gosnells, City of Armadale, City of Cockburn, Town of Kwinana
10	61.5 km	Swan Coastal Plain	Shire of Serpentine–Jarrahdale, Shire of Murray, Shire of Waroona	
Proposed tenure	The completed pipeline will be wholly within the existing DBNGP easement, which is gazetted under the Dampier to Bunbury Pipeline Act 1997 and the easement identified as Easement A as shown on the deposited plan numbered DP67493.			
DBNGP easement width	The existing DBNGP easement is 30 m wide. The area to be cleared and graded in the northern loops (Dampier to Muchea) will be approximately 30 m and south of Muchea, the area cleared will be 20 to 30 m. In environmentally sensitive areas, working widths will be 20 m. Additional easements may vary in width and all clearing will be subject to the conditions of the Ministerial Statement.			
Activities outside the DBNGP easement	Turnarounds, Campsites, Turkey nests*, Laydown areas, Water supply sources, Access roads, Works associated with watercourse and dune crossings			
Temporary area of disturbance within DBNGP easement	Approximately 3175 ha, all to be rehabilitated in consultation with landowners.			
Estimated area of vegetation clearing within DBNGP easement	Approximately 1264 ha, all to be rehabilitated in consultation with landowners.			
Temporary area of disturbance outside the DBNGP easement	Approximately 139 ha, all to be rehabilitated in consultation with landowners.			
Construction duration	The Stage 5 Expansion will be constructed in stages, with Stage 5A commencing in February 2007. The subsequent stages will be constructed to match the increasing demand in fuel gas, and full looping is expected to be substantially completed within five years of approval.			
Construction workforce	Up to 900 people			

* Turkey nests are artificially created water storages constructed by hollowing out an area of land and using the fill to build up its sides.

1.2 Environmental approval

DBNGP (WA) Nominees Pty Ltd (DBP) was granted environmental approval for the DBNGP Stage 5 Looping Expansion proposal under Part IV of the *Environmental Protection Act 1986* (EP Act). The Minister for Environment approved the proposal on 13 December 2006 with the release of Statement No. 735, which includes environmental conditions under which the proposal is to be implemented. Of the 72 environmental conditions, the majority of conditions relate to the preparation and implementation of management plans addressing areas of potential environmental risk identified during the assessment.

The required management plans were prepared and consolidated as management protocols into a Construction Environmental Management Plan (CEMP) (DBP 2011) that addressed a number of environmental factors additional to those required under the Statement, in order to meet the requirements of all environmental regulators.

2. Audit methodology

2.1 Audit plan

2.1.1 Purpose and scope

The purpose of this document is to enable compliance with Conditions 4–1 to 4–4 of Statement No. 735:

- 4–1 *The proponent shall submit to the CEO environmental compliance reports annually reporting on the previous twelve-month period, unless required by the CEO to report more frequently.*

Note: Annual reporting shall continue until such time as the Minister for the Environment determines on advice from the Environmental Protection Authority that the proponent has fulfilled its responsibilities in relation to the conditions within this Statement.

- 4–2 *The environmental compliance reports shall address each element of an audit program approved by the CEO and shall be prepared and submitted in a format acceptable to the CEO.*

- 4–3 *The environmental compliance reports shall:*

1. *be endorsed by signature of the proponent's Chairman or a person, approved in writing by the Chairman, delegated to sign on behalf of the proponent's Chairman;*
2. *state whether the proponent has complied with each condition and procedure contained in this statement;*
3. *provide verifiable evidence of compliance with each condition and procedure contained in this statement;*
4. *state whether the proponent has complied with each key action contained in any environmental management plan or program required by this statement;*
5. *provide verifiable evidence of conformance with each key action contained in any environmental management plan or program required by this statement;*
6. *identify all non-compliances and non-conformances and describe the corrective and preventative actions taken in relation to each non-compliance or non-conformance;*
7. *provide an assessment of the effectiveness of all corrective and preventative actions taken; and*
8. *describe the state of implementation of the proposal.*

- 4–4 *The proponent shall make the environmental compliance reports required by condition 4–1 publicly available in a manner approved by the CEO.*

This report relates to Stage 5 of the DBNGP for the period 14 December 2010 to 13 December 2011.

The report has been prepared for submission by DBP to the Chief Executive Officer of the Office of the Environmental Protection Authority (OEPA) (formerly, for compliance reporting, the Department of

Environment and Conservation [DEC]) to meet the requirements of Condition 4–1 of Statement No. 735 for submission of an annual compliance report.

The audit usually includes a determination as to whether a number of management plans are being implemented (as they are conditions of the Statement) and for this purpose, a number of key actions from the plans have been provided by DBP for the audit. The Key Actions were adopted by DBP for inclusion in annual compliance reports on Stage 5A, which were accepted by the DEC (now OEPA) and have been used for all subsequent compliance reporting. However, these Key Actions have not been included in this audit as no construction has occurred during this audit period.

It is also noted that where a previous Compliance Report has indicated a condition was 'Cleared', 'Completed' or 'Satisfactory during this period', and there has been no further requirement to implement the action, the evidence associated with the previous audit determination has been accepted without verification.

2.1.2 Methodology

The audit was conducted in December 2012-February 2013.

The audit involved a review of written documentation and consultation with personnel outlined in Table 2.1.

Table 2.1 Persons consulted during audits

Person and position	Organisation	Purpose
Kylie McKay Senior Environmental Advisor	DBP	To determine compliance in relation to the conditions of Statement 735.

The required reporting includes “whether the proponent has complied with each condition and procedure contained within the statement” and “conformed with each key action” (Conditions 4–3(2) and 4–3(4) respectively). This section describes how compliance with each condition and conformance with key actions has been audited and reported.

Where evidence has been presented in previous compliance reports, it has not been included with this report to minimise the bulk of reporting.

Audit results relating to the Statement conditions and key actions are summarised in Section 4 and detailed audit results presented in Section 5.

Where potential non-compliances have been identified, the corrective and preventative actions taken are described and an assessment of their effectiveness as required by Conditions 4–3(6) and 4–3(7) is provided in Section 4.3.

Compliance with Statement No. 735

An audit of compliance with the conditions and procedures of the Statement was conducted and a compliance status rating was applied in accordance with terminology described in Section 2.2. The full audit is presented in Section 5.1. The identified potential non-compliances are presented in Section 4.1.

Conformance with Key Actions

Condition 4–3(4) requires DBP to report on conformance with each key action contained within any management plan or program required by Statement No. 735. The conformance status rating was also applied in accordance with the Section 2.2 terminology.

Environmental management is primarily achieved through implementation of the CEMP, which contains a number of management protocols¹ that directly relate to all the construction requirements of the Ministerial Conditions. These protocols include a range of additional specific management actions reflecting good management. A number of the management actions within the CEMP directly reflect specific prescriptive conditions within the Statement.

Key actions from the CEMP have been identified as being:

- those management actions in the CEMP protocols implemented to manage a condition of the Statement
- those management actions in CEMP protocols that reflect a key intent of a condition of the Statement.

Using the above definition, key actions have been derived and audited. These key actions have been adopted for all compliance reporting to date. The results of the audit of key actions are presented in Section 4.1 and details of identified potential non-conformances are presented in Section 4.2.

Corrective and preventative actions

Statement Conditions 4–3(6) and 4–3(7) require descriptions of corrective and preventative actions taken in relation to each non-compliance or non-conformance, together with assessments of their effectiveness. These are presented in Section 4.3.

Evidence verification

Evidence to substantiate compliance with conditions contained within Statement No. 735 and key actions contained within the management plans or programs as required by Conditions 4–3(3) and 4–3(5) has been sourced from previous compliance reports and documentation provided by the proponent.

2.2 Audit terminology

The 'Status' field of the audit tables (refer to Table 5.1) describes the implementation of actions and compliance with the Statement. The status of each action is described using terminology prescribed by the Department of Environment and Conservation (DEC 2007) (Table 2.2). DEC (now OEPA) (2007) considers a non-compliance to be a failure to meet requirements specified in the Statement, and a non-conformance to be any deviation from procedures, programs and/or management actions detailed within an Environmental Management Plan.

¹ The management protocols in the CEMP include all the environmental management plans required under Statement No. 735 to be prepared for implementation of the proposal.

Table 2.2 Action implementation status

'Status' Term	Description	Notes
Satisfactory during this period	The action has been satisfactorily implemented during the audited period.	Ensure the auditing period is specified either in the report or the audit table.
In process	Action is in process of being implemented, but does not yet fully satisfy the requirements of the Ministerial Statement.	This can be used for those actions that, once completed, can be cleared (i.e. construction activities).
Potential non-compliance	Considered to be a potential failure to meet requirements of a condition in the Statement.	
Potential non-conformance	Considered to be any potential deviation from the procedures, programs and/or management actions detailed within an Environmental Management Plan or similar document.	Not all potential non-conformances will automatically constitute a potential non-compliance.
Not required at this stage	The proponent was not required to implement the action during the audited stage of the project.	This should be consistent with the 'Phase' field of the audit table.
No longer relevant	The action was not completed during the audited period, as the action is considered no longer relevant to the project.	The proponent should request approval for clearance of the audit element in order to remove its obligation to undertake the action.
Completed	The action was satisfactorily completed during the audited period.	This term can only be used for audit elements with a finite period of application (i.e. construction activities; development of a document). Once completed the proponent should request clearance of the audit element.
Cleared	Clearance for the action has been received from DEC.	The proponent is no longer legally obligated to implement the action.
Only proponent to audit	The action is only audited internally by the proponent.	
Monitored by another agency	The action is audited by another agency.	Prior approval for auditing by another agency must be obtained from the DEC. The agency must be specified (i.e. CALM, DEC licence).
Monitored under a DEC licence	This action is now monitored under Part V of the EP Act.	

Source: Adapted from DEC (2007)

3. STATE OF PROPOSAL IMPLEMENTATION

The DBNGP Stage 5 Looping Expansion is being constructed in stages, the first of which was Stage 5A, which commenced in February 2007 and was completed in March 2008. Stage 5B was commenced in January 2009 and completed in November 2011.

The statistics related to implementation of the proposal as at 13 December 2012 is summarised in Table 3.1. Of the total 1270 km of the Stage 5 proposal, 1011 km have now been constructed.

Table 3.1 Progress of DBNGP Stage 5 Looping Expansion Project

Loop	Stage 5A		Stage 5B	
	Loop Lengths (km)*	Status of Loops	Loop Lengths (km)*	Status of Loops
Loop 0	0.0	No construction in Loop 0 undertaken in Stage 5A	114.9	Complete
Loop 1	74.0	Complete	32.9	Complete
Loop 2	57.8	Complete	31.9	Complete
Loop 3	60.3	Complete	34.6	Complete
Loop 4	61.9	Complete	33.6	Complete
Loop 5	63.7	Complete	34.0	Complete
Loop 6	70.5	Complete	35.8	Complete
Loop 7	60.4	Complete	44.0	Complete
Loop 8	55.3	Complete	21.8	Complete
Loop 9	52.0	Complete	23.4	Complete
Loop 10	15.1	Complete	33.3	Complete
TOTAL	571.1		440.2	

Completion of Stage 5A was considered to be evidence of substantial commencement of the project as required under Condition 3–2, as reported in the 2007 compliance report (DBP 2008).

As outlined in the 2007 compliance report (DBP 2008), the above description satisfies the requirements of Condition 4–3(8).

4. Audit results

This report has been prepared to address the status and compliance of the proposal with the conditions in the Statement in accordance with the annual compliance reporting requirements of Conditions 4–1 to 4–4 of the Statement. The report considers the extent of compliance with each of the 72 conditions, and the extent of conformance with the 42 actions within approved management plans required under various conditions and determined to be Key Actions.

4.1 Compliance with Statement No 735 conditions

The detailed results of the audit of Statement 735 are presented in Section 5.1 (Table 5.1). Condition 1-1 of Statement 735 requires implementation of the proposal as documented in Schedule 1 of the Statement. As no construction occurred during this audit period and the previous audit (Strategen 2012a) determined that there were no potential non-conformances with Schedule 1, this has not been audited during this audit period.

No potential non-compliance with Statement No. 735 was identified by the auditors.

4.2 Conformance with Key Actions

Condition 4–3(4) of Statement No. 735 requires the proponent to demonstrate compliance with key actions contained in any environmental management plan or program required by the Statement. As the key actions all relate to construction activities and no such activities were undertaken during the report period, this condition is considered to be Not Applicable (N/A) to this report.

4.3 Corrective actions

No corrective actions were required as there were no potential non-compliances.

5. AUDIT TABLES

5.1 Statement No. 735 Summary Audit Tables

Table 5.1 has been produced to meet condition 4–3(2) of Statement No. 735.

Table 5.1 Results of audit of Statement No. 735

Audit code	Subject	Action	How	Objective	Phase/Timing	Criteria	Evidence	Finding	Status
735:M1.1	Implementation	Implement the proposal as documented and described in schedule 1 of Statement 735 subject to the conditions and procedures of this statement.	Establish and implement an auditing compliance reporting system.	To avoid unforeseen or unassessed impacts	Overall	-	DBNGP Stage 5 Looping Expansion Project 2011 Annual Environmental Compliance Report (Strategen 2012a)	Refer to Strategen (2012a) with respect to implementation as described in Schedule 1 of Statement No. 735. No additional construction has occurred since the previous audit period reported in above AECR.	Satisfactory during this period
735:M2.1	Nominated proponent	Implement the proposal until such time as the Minister for the Environment nominates another person as the proponent.	Establish and implement auditing compliance reporting system.	To ensure responsibility rests with the nominated proponent	Overall	Has Minister nominated another person as proponent?		DBP remains the proponent.	Satisfactory during this period
735:M2.2	Proponent contact details	Notify the Chief Executive Officer of the DEC (CEO) of any change of the contact name and address for the serving of a notice or other correspondence within 30 days of such change.	Written notification.	To enable the DEC to maintain contact with the proponent	Overall	Has the contact name and address for the serving of a notice or other correspondence for the project changed since approval; if so, was the Chief Executive Officer of the DEC (CEO) informed within 30 days of such change.	Website indicates that contact name and address have not changed since Loop 10 compliance audit (Strategen 2008). Recent correspondence from DBP supports this.	Auditors were advised that the contact address for DBP has not changed.	Not required at this stage
735:M3.1	Authorisation limit	Substantially commence the proposal before 13 December 2011 to avoid lapse of authorisation.	Written notification.	To keep DEC informed of project status	Construction	Substantial construction commenced	DBNGP Stage 5 Looping Expansion Project, 2007 Annual Environmental Compliance Report (DBP 2008). DBNGP Stage 5 Looping Expansion Project, 2009 Annual Environmental Compliance Report (Strategen 2010). DBNGP Stage 5 Looping Expansion Project 2010 Annual Environmental Compliance Report (Strategen 2011) DBNGP Stage 5 Looping Expansion Project 2011 Annual Environmental Compliance Report (Strategen 2012a)	Previous Annual Compliance Audits indicates construction of Stage 5A and 5B are complete and this represents 79.6% of the total length of the proposal. This is considered to represent substantial commencement.	Completed
735:M3.2	Commencement	Provide the CEO with written evidence which demonstrates that the proposal has substantially commenced on or before the 13 December 2011.	Written notification.	To keep DEC informed of project status	Construction	Substantial construction commenced	DBNGP Stage 5 Looping Expansion Project 2011 Annual Environmental Compliance Report (Strategen 2012a)	Previous compliance report (Strategen 2012a) indicates this has occurred.	Completed
735:M4.1	Compliance reporting - submitting	Submit to the CEO environmental compliance reports reporting on the previous twelve-month period. (Annual Environmental Compliance Report [AECR])	Reports shall address that required by condition 4-2 and condition 4-3.	To provide evidence that the proposal is being implemented and conditions are being met	Overall	Annually unless required by the CEO to report more frequently. Annual reporting shall continue until such time as the Minister for the Environment determines on advice from the EPA that the proponent has fulfilled its responsibilities in relation to the conditions within this statement.	2011 AECR covering period 14 Dec 2010 to 13 Dec 2011 2012 AECR covering period 14 Dec 2011 to 13 Dec 2012 (this report) 2011 AECR (Strategen 2012a) dated July 2012. The report covered the period from 14 Dec 2010 to 13 Dec 2011. This report is intended to satisfy the requirements for reporting up until 13 December 2012. Letter from OEPA acknowledging receipt of 2011 AECR.	2011 AECR (Strategen 2012a) dated July 2012 was provided. The report covered the period from 14 Dec 2010 to 13 Dec 2011. This AECR is considered relevant to the auditing period covered by this audit report. This audit report is intended to satisfy the requirements for reporting up until 13 December 2011.	Satisfactory for 2011 AECR In process for the 2012 AECR
735:M4.2	Audit Program	Prepare an audit program.	Develop an audit table listing implementation conditions and detail how these will be met. Develop criteria and standards that will be used to measure compliance.	To develop a system of monitoring implementation and environmental performance of the proposal	Design	Audit Table prepared to the satisfaction of the CEO, DEC.	DBNGP Stage 5 Looping Expansion Project – 2007 Annual Environmental Compliance Audit (DBP 2008)	Audit Program was prepared and signed-off by DEC. Relevant correspondence was sighted in a previous Compliance Audit.	Completed

Audit code	Subject	Action	How	Objective	Phase/Timing	Criteria	Evidence	Finding	Status
735:M4.3	Annual environmental compliance reporting - preparation	The environmental compliance reports shall: 1. Be endorsed by signature of the proponent's Chairman or a person, approved in writing by the Chairman, delegated to sign on behalf of the proponent's Chairman. 2. State whether the proponent has complied with each condition and procedure contained in Statement 735. 3. Provide verifiable evidence of compliance with each condition and procedure contained in Statement 735. 4. State compliance with each key action contained in any environmental management plan or program required by Statement 735. 5. Provide verifiable evidence of conformance with each key action contained in any environmental management plan or program required by Statement 735. 6. Identify all non-compliances and non-conformances and describe the corrective and preventative actions taken in relation to each non-compliance or non-conformance. 7. Provide an assessment of the effectiveness of all corrective and preventative actions taken. 8. Describe the state of implementation of the proposal.	Reports presented to satisfy this condition with respect to the content.	To provide evidence that the proposal is being implemented and conditions are being met	Overall	2011 AECR covering period 14 Dec 2010 to 13 Dec 2011	DBNGP Stage 5 Looping Expansion Project 2011 Annual Environmental Compliance Report (Strategen 2012a). This report is intended to satisfy the requirements for reporting up until 13 December 2012. Letter from OEPA confirming compliance with this condition.	The 2011 AECR was reviewed and determined to be compliant with all clauses within this action. Report signed by CEO of DBP as currently no Chairman. This audit report is intended to satisfy the requirements for reporting up until 13 December 2012.	Satisfactory during this period In process for the 2012 AECR
735:M4.4	Annual environmental compliance reporting – public availability	Make the environmental compliance reports (AECRs) publicly available.	Carry out the following: 1. Provide copies of the documentation to the DEC library 2. Post the document on the proponent's website.	To ensure that the public is kept informed of the proposal and compliance with conditions	Overall Annually	As approved by the CEO.	DBNGP Stage 5 Looping Expansion Project 2011 Annual Environmental Compliance Report (Strategen 2012a). DBP website [http://www.dbp.net.au/Libraries/Expansion_Reports/Annual_EPA_Compliance_Report_2011.pdf], accessed 10 December 2012. Cover letter to OEPA, Proposal Implementation Monitoring Branch (25 July 2012)	The Auditors reviewed the DBP website and found that the 2011 AECR was available. Cover letter for 2011 AECR (25 July 2012) indicated two copies were provided to OEPA, with the second copy to be placed in the agency library.	Satisfactory during this period

Audit code	Subject	Action	How	Objective	Phase/Timing	Criteria	Evidence	Finding	Status
735:M5.1	Performance review – prepare and submit	Submit a Performance Review report every five years after the start of construction to the EPA, which addresses: 1. The major environmental issues associated with implementing the project; the environmental objectives for those issues; the methodologies used to achieve these; and the key indicators of environmental performance measured against those objectives. 2. The level of progress in the achievement of sound environmental performance, including industry benchmarking, and the use of best available technology where practicable. 3. Significant improvements gained in environmental management, including the use of external peer reviews. 4. Stakeholder and community consultation about environmental performance and the outcomes of that consultation, including a report of any on-going concerns being expressed. The proposed environmental objectives over the next five years, including improvements in technology and management processes.	The Performance Review report will address the required actions.	To provide evidence of environmental performance and to identify aspects that may require environmental improvements	Overall Every 5 years after the start of construction	-	DBNGP Stage 5 Looping Expansion Project – 2007 Annual Environmental Compliance Audit (DBP 2008) DBNGP Stage 5 Looping Expansion Project Five Year Performance Review (2007-2012) (Strategen 2012b)	2007 AECR noted commencement of construction in February 2007. DBNGP Stage 5 Looping Expansion Project Five Year Performance Review (2007-2012) (Strategen 2012b) prepared.	Satisfactory during the period
735:M5.2	Performance review – public availability	Make the Performance Review reports publicly available.	Carry out the following: 1. Provide copies of the documentation to the DEC library 2. Post the document on the proponent's website	To ensure that the public is kept informed of the environmental performance of the proponent	Overall Every 5 years after the start of construction	-	DBNGP Stage 5 Looping Expansion Project Five Year Performance Review (2007-2012) (Strategen 2012b) DBP website: [http://www.dbp.net.au/Libraries/Expansion_Reports/EPA_5_YR_Performance_Review_2012.pdf] accessed 10 December 2012. Letter to OEPA, Proposal Implementation Monitoring Branch (3 August 2012)	The Auditors reviewed the DBP website and found that the Five Year Performance Review was available. Cover letter for the Five Year Performance Review (3 August 2012) indicated two copies were provided to OEPA, with the second copy to be placed in the agency library.	Satisfactory during the period
735:M6.1	Compliance audit - submit	Submit a written compliance audit report to the CEO within 30 days of the conclusion of the construction of each loop section.	The report shall address that outlined in condition 6-2, 6-3 and 6-4.	To provide evidence that the conditions are being met within each loop section	Overall Within 30 days of construction completion in each loop section	Completion of each loop section is considered to be at the time of hand over of the Loop from DBP Construction to Operations.	DBP Stage 5B Expansion - Stage 5B Loop 0 Fortescue River Crossing Compliance Audit (Strategen 2012c) OEPA Desktop Audit Report (OEPA, June 2012) Cover letter to Manager Compliance Monitoring Section, DEC, 3 May 2012.	DBP advised that commissioning of Loop 0 – FRC occurred on 30 November 2011, with handover scheduled in April 2012 (as stated in Strategen 2012c). OEPA Desktop Audit Report (OEPA 2012) determined DBP compliant with this condition. The Loop 0 – FRC Audit report completed. Cover letter from DBP sighted. Submission date 3 May 2012.	Satisfactory during the period
735:M6.2	Compliance report - prepare	The compliance audit report shall outline identified non-compliances against the conditions of Statement 735.	-	To provide evidence that the conditions are being met within each loop section	Overall	-	DBP Stage 5B Expansion - Stage 5B Loop 0 Fortescue River Crossing Compliance Audit (Strategen 2012c)	The Loop 0 – FRC Compliance Audit includes reference to two potential non-compliances.	Satisfactory during the period
735:M6.3	Compliance report - prepare	The report shall be endorsed by signature of the proponent's Chairperson or a person approved in writing by the Chairperson, delegated to sign on behalf of the proponent's Chairperson.	-	To provide evidence that the conditions are being met within each loop section	Overall Within 30 days of construction completion in each loop section	-	DBP Stage 5B Expansion - Stage 5B Loop 0 Fortescue River Crossing Compliance Audit (Strategen 2012c)	Cover letter signed by Company Secretary with permission from CEO as DBP currently has no Chairperson.	Satisfactory during this period
735:M6.4	Compliance report - prepare	The report shall include the date, time and location of the non-compliances, the reason for the non-compliances, actions taken to remedy non-compliances and details of management measures implemented to reduce the risk of future non-compliances	Establish and implement auditing compliance reporting system.	To provide evidence that the conditions are being met within each loop section	Overall Within 30 days of construction completion in each loop section	-	DBP Stage 5B Expansion - Stage 5B Loop 0 Fortescue River Crossing Compliance Audit (Strategen 2012c)	Non compliances were reported in the Loop 0 – FRC end-of-loop report. Reporting with respect to the management measures implemented to reduce the risk of future non-compliances were reported in Section 4.3 of the 2011 AECR (Strategen 2012a)	Satisfactory during the period

Audit code	Subject	Action	How	Objective	Phase/Timing	Criteria	Evidence	Finding	Status
735:M7.1	Spring flora surveys	Submit a report to the CEO, which details the results of the spring flora, surveys undertaken in 2006.	This report shall: 1. Record the location of any Declared Rare Flora, Priority Flora and other species of conservation significance. 2. Identify any Threatened Ecological Communities and other environmentally sensitive areas. 3. Describe the habitat in which specially protected or conservation-significant flora species were found, and the extent of the contiguous area of the same habitat in the local area. 4. Specify the degree of impact of the proposed works on specially protected or conservation-significant flora species, its identified contiguous habitat or Threatened Ecological Communities and other environmentally sensitive areas.	To determine if conservation significant species occur within the proposal area and the potential impact on them	Design Prior to the commencement of vegetation clearing	Survey shall be conducted in accordance with Guidance Statement No. 51 (EPA 2004)	DBNGP Stage 5 Looping Expansion Project – 2007 Annual Environmental Compliance Audit (DBP 2008)	Condition satisfied as reported in the 2007 annual compliance report (DBP 2008).	Cleared
735:M7.2	Flora and Vegetation Management Plan - preparation	Prepare a Flora and Vegetation Management Plan, in consultation with the DEC.	The Plan shall: • Identify the proposed management strategy for the protection of Declared Rare Flora, Priority Flora, Threatened Ecological Communities, other conservation significant species and other environmentally sensitive areas identified. • Include a post-activity monitoring plan for specially protected or conservation-significant flora species.	To minimise and manage disturbance of remnant vegetation or conservation significant flora	Design Prior to the commencement of vegetation clearing	-	DBNGP Stage 5 Looping Expansion Project – 2007 Annual Environmental Compliance Audit (DBP 2008)	Condition satisfied as reported in the 2007 annual compliance report (DBP 2008).	Cleared
735:M7.3	Flora and Vegetation Management Plan - implementation	Implement the Flora and Vegetation Management Plan.	-	To ensure appropriate management actions are taken to minimise any impacts on flora and vegetation	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M7.4	Flora and Vegetation Management Plan – public availability	Make the Flora and Vegetation Management Plan publicly available.	The revised requirement for making the Flora and Vegetation Management plan publicly available is as follows: Carry out the following: 1) Provide a hard copy to the DEC library and 2) Make the Management Plan available on the DBNGP website	To ensure the public is kept informed	Overall	-	DBNGP Stage 5 Looping Expansion Project – 2007 Annual Environmental Compliance Audit (DBP 2008) DBNGP Stage 5 Expansion Looping Project [DBPL00-501-0722-01] Construction Environmental Management Plan (and Appendices) Controlled Version 2 Revision D (17 August 2011) DBP website (DBP 2011) copy at http://www.dbp.net.au/the-pipeline/expansion.aspx	Requirement previously considered 'Substantially in compliance'. No revision required during this audit period.	Satisfactory during this period
735:M8.1	Vegetation disturbance – clear delineation	Clearly delineate on the ground the boundaries of the pipeline easement and the area of disturbance outside the easement.	Implement the Flora and Vegetation Management Plan and Conservation Area Management Plan.	To minimise clearing of vegetation	Design Prior to ground-disturbing activities	As established in the Flora and Vegetation and Conservation Area Management Plans.	N/A	No construction occurring within this audit period.	Not required at this stage

Audit code	Subject	Action	How	Objective	Phase/Timing	Criteria	Evidence	Finding	Status
735:M8.2	Vegetation disturbance – exceedance of boundaries	Do not cause disturbance of vegetation outside the delineated pipeline easement, or the delineated area of disturbance outside the easement, unless authorised by the Minister for the Environment.		To minimise disturbance of remnant vegetation	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M8.3	Vegetation disturbance – environmentally sensitive areas	Do not cause or allow disturbance of vegetation outside the 20 metre wide easement located within environmentally sensitive areas, unless authorised by the Minister for the Environment.	Establish and implement auditing compliance reporting system.	To minimise disturbance of vegetation in environmentally sensitive areas	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M9.1	Fauna Management Plan - preparation	Prepare a Fauna Management Plan, which includes a Fauna Interaction Protocol, in consultation with the DEC.	The Plan shall include: <ul style="list-style-type: none"> Procedures to minimise and manage impacts on all native fauna, including conservation-significant fauna species identified in Bancroft and Bamford, Fauna Values of Stage 5 of the Dampier to Bunbury Natural Gas Pipeline (DBNGP): A Review (2006). Procedures for the management of water bodies within open trenches to minimise fauna death or injury. 	To minimise direct impacts on native fauna	Design Prior to ground disturbing activities	-	DBNGP Stage 5 Looping Expansion Project – 2007 Annual Environmental Compliance Audit (DBP 2008)	Condition satisfied as reported in the 2007 annual compliance report (DBP 2008).	Cleared
735:M9.2	Fauna – trench clearing	The clearing of open trenches by the fauna-clearing persons is to be completed each day by no later than 4.5 hours after sunrise for Loops 0 to 7 and no later than 5 hours after sunrise for Loops 8 to 10 and at least half an hour prior to the backfilling of pipeline trenches.	-	To minimise death or injury to fauna trapped in the open trenches	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M9.3	Fauna – open trench length	Open trench lengths shall not exceed a length capable of being inspected and cleared by fauna clearing persons within the required times as set out in conditions 9-2, 10-2 and 10-4.	-	To minimise death or injury to fauna trapped in the open trenches	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M9.4	Fauna – identification of significant habitat trees	Significant habitat trees of sufficient age to form nesting hollows for hollow-nesting birds and mammals shall be marked, prior to construction, in consultation with the DEC.	-	To identify significant habitat trees that can be retained	Construction Prior to construction in each area	A habitat tree was assessed as having habitat value if it had 'a trunk diameter greater than 30 centimetres at breast height, irrespective of availability of lack of any evidence of use by fauna' (CEMP Controlled version 2)	N/A	No construction occurring within this audit period.	Not required at this stage
735:M9.5	Fauna – retention of significant habitat trees	Marked significant habitat trees as referred to in condition 9-4 shall be retained, except in the case where habitat trees occur in the direct line of the proposed pipeline.	-	To retain significant habitat trees for fauna, where possible	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M9.6	Fauna – backfill of trench	Monitor weather forecasts through the Bureau of Meteorology and in the event of a weather forecast indicating rainfall sufficient to cause flooding of trenches or drowning of fauna trapped in trenches, in consultation with DEC, backfill all lengths of open trench with a potential to be flooded or cause drowning of fauna.	-	To minimise harm to fauna that could be trapped and drown in open trenches	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M9.7	Fauna – period that trench is open	Where wet trenching is conducted, trenches shall not remain open for periods longer than 48 hours within wetlands and environmentally sensitive areas and 7 days for all other areas.	-	To minimise death or injury to fauna	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage

Audit code	Subject	Action	How	Objective	Phase/Timing	Criteria	Evidence	Finding	Status
735:M9.8	Fauna – qualifications of clearing persons	The fauna clearing persons shall operate in teams of two with at least one fauna clearing person experienced in the following, to the requirements of DEC: <ul style="list-style-type: none"> Fauna identification, capture and handling (including venomous snakes). Identification of tracks, scats, burrows and nests of conservation significant species. Fauna vouchering. Assessing injured fauna for suitability for release, rehabilitation or euthanasia. Familiarity with the ecology of the species that may be encountered in order to be able to appropriately translocate fauna encountered. Performing euthanasia. 	-	To ensure fauna handling is of a high standard	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M9.9:1	Fauna – clearing person training	Ensure that basic fauna handling training is provided to fauna clearing persons who do not possess the skills and experience outlined in condition 9-8 prior to the fauna clearing person commencing employment.	-	To ensure fauna handling is of a high standard	Design	In accordance with training developed in consultation with DEC.	N/A		Not required at this stage
735:M9.9:2	Fauna clearing person-training	Ensure that basic fauna handling training is provided to fauna clearing persons who do not possess the skills and experience outlined in condition 9-8 prior to the fauna clearing person commencing employment.		To ensure fauna handling is of a high standard	Construction	In accordance with training developed in consultation with DEC.	N/A	No construction occurring within this audit period.	Not required at this stage
735:M9.10:1	Fauna – clearing person training	The fauna handling training as outlined in condition 9-9 shall be developed in consultation with the DEC.	-	To ensure best practice management	Design	-	N/A		Not required at this stage
735:M9.10:2	Fauna – clearing person training	The fauna handling training as outlined in condition 9-9 shall be developed in consultation with the DEC.	-	To ensure best practice management	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M9.11	Fauna – period that trench is open	No part of the trench shall remain open for more than 14 days except 'bell holes', unless authorised by the CEO.	Establish record log book as required by condition 9-13.	To minimise death or injury to fauna	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M9.12	Fauna – period that trench is open	In environmentally sensitive areas, no part of the trench shall remain open for more than seven days, unless authorised by the CEO.	Establish record log book as required by condition 9-13.	To minimise death or injury to fauna	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M9.13	Fauna – period that trench is open	In order to comply with condition 9-11 and condition 9-12, record each day in a log and on the ground the kilometre points of the start point and finish point of the trench opened on each day.	-	To ensure conditions are complied with	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M9.14	Fauna Management Plan – review and revise	Review and revise, as required, the Fauna Management Plan required by condition 9-1.	Utilise compliance, performance and auditing reports.	To ensure best practice management	Construction	-	DBNGP Stage 5 Expansion Looping Project DBPL00-501-0722-01 Construction Environmental Management Plan (CEMP) Controlled Version 2 Revision D (17 August 2011) Revision Record	No revisions during this audit period.	Not required at this stage
735:M9.15	Fauna Management Plan - implementation	Implement the Fauna Management Plan and subsequent revisions.	Incorporate in construction planning	To ensure appropriate management actions are taken to minimise any impacts on fauna	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage

Audit code	Subject	Action	How	Objective	Phase/Timing	Criteria	Evidence	Finding	Status
735:M9.16	Fauna Management Plan – public availability	Make the Fauna Management Plan and subsequent revisions publicly available.	The revised requirement for making the Fauna Management plan publicly available is as follows: Carry out the following: 1) Provide a hard copy to the DEC library and 2) Make the Management Plan available on the DBNGP website.	To ensure the public is kept informed	Overall	-	DBNGP Stage 5 Expansion Looping Project [DBPL00-501-0722-01] Construction Environmental Management Plan (and Appendices) Controlled Version 2 Revision D (17 August 2011)	No revisions during this audit period.	Completed in regards to original Plan Revision not required during this audit period
735:M9.17	Fauna management – performance monitoring reports	Produce weekly performance monitoring reports on fauna management for each loop.	The Reports shall include, but not necessarily be limited to, details of all fauna inspections, the number of fauna cleared from trenches, fauna interactions, fauna mortalities and all actions taken. These reports are to be provided to the CEO each week.	To provide evidence of the effectiveness of fauna management measures	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M9.18:1	Fauna management – performance monitoring reports	Produce monthly performance monitoring reports on fauna management for each Loop.	The Reports shall include, but not necessarily be limited to, details of all fauna inspections, the number of fauna cleared from trenches, fauna interactions, fauna mortalities and all actions taken.	To provide evidence of environmental performance in relation to fauna management	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M9.18:2	Fauna management – performance monitoring reports	Make the monthly performance monitoring reports publicly available on completion of each loop.	The revised requirement for making monthly performance monitoring reports publicly available is as follows, reports to be provided to: 1) The DEC (Compliance Monitoring Section) 2) The DEC library 3) Made available on the website of the DBNGP	To ensure the public is kept informed	Overall	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M10.1	Timing of construction works – Loops 0 to 2	Avoid open trench work on Loops 0 to 2 from November to March inclusive unless otherwise allowed for in condition 10-2.	Establish and implement auditing compliance reporting system.	To avoid working in the wet season	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M10.2	Timing of construction works – Loops 0 to 2	In the event that open trench work on Loops 0 to 2 is conducted during November to March the following shall be undertaken: <ul style="list-style-type: none"> Provide a report to the DEC outlining the reasons why open trench work was necessary during the period November to March inclusive. Complete fauna clearing as described in condition 9-2 by 3 hours after sunrise or when daily temperatures are forecast by the Bureau of Meteorology to exceed 35°C fauna clearing shall be completed by 2.5 hours after sunrise. 	Establish and implement auditing compliance reporting system.	To avoid working in the wet season	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M10.3	Timing of construction works – Loops 8 to 10	Avoid open trench work on Loops 8 to 10 from June to December (inclusive) unless otherwise allowed for in condition 10-4.	Establish and implement auditing compliance reporting system.	To avoid working in the wet season	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M10.4	Timing of construction works – Loops 8 to 10	Where open trench work is undertaken during June to December inclusive the following shall be undertaken: <ul style="list-style-type: none"> Provide a report to the DEC outlining the reasons why open trench work was necessary during the period June to December inclusive. Implement the Wetlands Crossing Management Plan (condition 12-1) and the Dieback and Weed Management Plan (condition 13-2). 	Establish and implement auditing compliance reporting system.	To avoid working in the wet season	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage

Audit code	Subject	Action	How	Objective	Phase/Timing	Criteria	Evidence	Finding	Status
735:M11.1:1	Watercourses – vegetation delineation	Delineate the riparian vegetation along watercourses which will be traversed.	-	To minimise and manage disturbance of riparian vegetation	Design	-	N/A		Not required at this stage
735:M11.1:2	Watercourses-vegetation delineation.	Delineate the riparian vegetation along watercourses which will be traversed	-	To minimise and manage disturbance of riparian vegetation	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M11.2	Watercourse Crossing Management Plan -	Prepare in consultation with the DEC, a Watercourse Crossing Management Plan to minimise disturbance of riparian vegetation.	The Plan shall address: <ul style="list-style-type: none"> Objectives and key performance criteria. Management actions (e.g. general requirements, surveying, trenching and excavation, drilling). Monitoring and recording. Contingency actions. 	To minimise and manage disturbance of watercourses	Design Prior to ground-disturbing activities	-	DBNGP Stage 5 Looping Expansion Project – 2007 Annual Environmental Compliance Audit (DBP 2008)	Condition satisfied as reported in the 2007 annual compliance report (DBP 2008).	Cleared
735:M11.3	Watercourse Crossing Management Plan - implementation	Implement the Watercourse Crossing Management Plan.	Incorporate into construction planning	To ensure appropriate management actions are taken to minimise any impacts on watercourses	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M11.4	Watercourse Crossing Management Plan – public availability	Make the Watercourse Crossing Management Plan publicly available	The revised requirement for making the Watercourse Crossing Management Plan publicly available is as follows: Carry out the following: 1) Provide a hard copy to the DEC library and 2) Make the Management Plan available on the DBNGP website.	To ensure the public is kept informed	Overall	-	DBP website (DBP 2011) copy at http://www.dbp.net.au/Libraries/Expansion_Reports/DBP08048_DBN_GP_Stage5B_CEMP_DMP_CV2_Rev_1_Main_Report.pdf [accessed 10 December 2012]	Requirement previously considered 'Substantially in compliance'.	Completed
735:M12.1	Wetland crossing Management Plan - prepare	Prepare, in consultation with the DEC, a Wetland Crossing Management Plan.	As described in condition 12-2.	To minimise and manage disturbance to wetlands and wetland buffer areas	Design	Criteria established by condition 12-1	DBNGP Stage 5 Looping Expansion Project – 2007 Annual Environmental Compliance Audit (DBP 2008)	Condition satisfied as reported in the 2007 annual compliance report (DBP 2008).	Cleared
735:M12.2	Wetland crossing Management Plan - prepare	The Wetland Crossing Management Plan shall set out procedures to protect any wetland crossed by the trench in the event that trenching is proposed where there is standing water in the wetland.	Establish and implement auditing compliance reporting system.	To minimise and manage disturbance to wetlands and wetland buffer areas	Design	Criteria established by condition 12-1	DBNGP Stage 5 Looping Expansion Project – 2007 Annual Environmental Compliance Audit (DBP 2008)	Condition satisfied as reported in the 2007 annual compliance report (DBP 2008).	Cleared
735:M12.3	Wetland Crossing Management Plan - implementation	Implement the Wetland Crossing Management Plan.	-	To ensure appropriate management actions are taken to minimise any impacts on wetlands	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M12.4	Wetland Crossing Management Plan – public availability	Make the Wetland Crossing Management Plan publicly available.	The revised requirement for making the Wetland Crossing Management Plan publicly available is as follows: Carry out the following: 1) Provide a hard copy to the DEC library and 2) Make the Management Plan available on the DBNGP website.	To ensure the public is kept informed	Overall	-	DBP website (DBP 2011) copy at http://www.dbp.net.au/Libraries/Expansion_Reports/DBP08048_DBN_GP_Stage5B_CEMP_DMP_CV2_Rev_1_Main_Report.pdf [accessed 10 December 2012]	The CEMP was available on the DBP website during the audit period.	Completed
735:M13.1	Dieback – delineate risk areas	Delineate surveyed occurrences of high risk, medium risk and medium to low risk dieback areas.	Establish and implement auditing compliance reporting system.	To minimise and manage the risk of introducing or spreading dieback	Design	-	N/A	No planning during this audit period	Not required at this stage
735:M13.2	Dieback and Weed Management Plan - prepare	Prepare a Dieback and Weed Management Plan.	The plan shall address: Objectives and key performance criteria. Management actions (e.g. general requirements, hygiene management procedures). Monitoring and recording. Contingency actions.	To minimise the risk of introducing or spreading weeds and/or diseases	Design Prior to ground disturbing activities	-	DBNGP Stage 5 Looping Expansion Project – 2007 Annual Environmental Compliance Audit (DBP 2008)	Condition satisfied as reported in the 2007 annual compliance report (DBP 2008).	Cleared

Audit code	Subject	Action	How	Objective	Phase/Timing	Criteria	Evidence	Finding	Status
735:M13.3	Dieback and Weed Management Plan – review and revise	In consultation with the DEC, review and revise, as required, the Dieback and Weed Management Plan.	-	To ensure best management practice	Construction	-	DBNGP Stage 5 Expansion Looping Project [DBPL00-501-0722-01] Construction Environmental Management Plan (and Appendices) Controlled Version 2 Revision D (17 August 2011)	No revision required during this audit period	Satisfactory during the period
735:M13.4	Dieback and Weed Management Plan - implementation	Implement the Weed and Dieback Management Plan and any subsequent revisions of the Weed and Dieback Management Plan.	Incorporate in construction planning	To ensure appropriate management actions are taken to minimise impacts from weed and dieback introduction and/or spread	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M13.5	Dieback and Weed Management Plan – public availability	Make the Weed and Dieback Management Plan and any subsequent revisions required by condition 13-3 publicly available.	The revised requirement for making the Weed and Dieback Management Plan publicly available is as follows: Carry out the following: 1) Provide a hard copy to the DEC library and 2) Make the Management Plan available on the DBNGP website.	To ensure the public is kept informed	Overall	-	DBNGP Stage 5 Looping Expansion Project – 2007 Annual Environmental Compliance Audit (DBP 2008) DBNGP Stage 5 Expansion Looping Project [DBPL00-501-0722-01] Construction Environmental Management Plan (and Appendices) Controlled Version 2 Revision D (17 August 2011) DBP website (DBP 2011) copy at http://www.dbp.net.au/the-pipeline/expansion.aspx	Requirement previously considered 'Substantially in compliance'. No revision required during this audit period.	Satisfactory during this period
735:M14.1	Rehabilitation Management Plan - prepare	Prepare a Rehabilitation Management Plan.	The Plan shall address: 1. Weed management protocols. 2. Dieback management protocols. 3. Soil management protocols. 4. Rehabilitation completion criteria. 5. The need for propagule augmentation to achieve completion criteria	To re-establish vegetation and associated habitat areas, controlling sediment and erosion.	Design Prior to ground-disturbing activities	Criteria established by condition 14-1	DBNGP Stage 5 Looping Expansion Project – 2007 Annual Environmental Compliance Audit (DBP 2008)	Condition satisfied as reported in the 2007 annual compliance report (DBP 2008).	Cleared
735:M14.2	Rehabilitation – management period	Manage rehabilitation of the pipeline route until the rehabilitation completion criteria, referred to in condition 14-1, have been achieved (Note: obligations under DoIR legislation mean the vehicular access track must be maintained and thus certain completion criteria may not be achievable within the access track).		To ensure effective rehabilitation	Overall	Criteria established by condition 14-1	DBNGP Stage 5 Looping Expansion Project – 2011 Annual Environmental Compliance Audit (Strategen 2012a) DBNGP Flora and Vegetation Rehabilitation Monitoring: Stage 5a Loops 1–6 (Mattiske, March 2012) DBNGP Flora and Vegetation Rehabilitation Monitoring: Stage 5b Loops 0–6 (Mattiske, February 2012) DBNGP Flora and Vegetation Rehabilitation Monitoring: Stage 5b Loops 7–10 (Mattiske, June 2012)	Stage 5A monitoring occurring. Mattiske (2012a) indicated that three out of four completion criteria were met overall in the 2011 monitoring. Native species density criterion was not met for Loop 1; Loop 2 and Loop 6 on average. Stage 5B monitoring occurring. Mattiske (2012b) indicated all seven loops (0–6) met the 24 month completion criteria for native species richness and six of the seven loops met the criteria for native foliage cover. Four loops did not meet the criteria for weed cover; however, the foliage cover for weeds in on these loops was similar to control sites. Loops 7–10 varied in their rehabilitation progress (Mattiske 2012c). DBP advised that discussions have commenced with DEC in regards to future remediation options that will enable completion criteria to be met.	In process

Audit code	Subject	Action	How	Objective	Phase/Timing	Criteria	Evidence	Finding	Status
735:M14.3:1	Rehabilitation Management Plan – review and revision	In consultation with the DEC, review and revise, as required, the Rehabilitation Management Plan.	-	To ensure best practice	Construction	-	DBNGP Stage 5 Expansion Looping Project [DBPL00-501-0722-01] Construction Environmental Management Plan (and Appendices) Controlled Version 2 Revision D (17 August 2011) Revision Record	No revision required during this audit period.	Not required at this stage
735:M14.3:2	Rehabilitation Management Plan – review and revision	In consultation with the DEC, review and revise, as required, the Rehabilitation Management Plan.	-	To ensure best practice	Operation	-	DBNGP Stage 5 Expansion Looping Project [DBPL00-501-0722-01] Construction Environmental Management Plan (and Appendices) Controlled Version 2 Revision D (17 August 2011) Revision Record	No revision required during this audit period.	Not required at this stage
735:M14.4:1	Rehabilitation Management Plan - implementation	Implement the Rehabilitation Management Plan and subsequent revisions until such time as the completion criteria are met.	-	To ensure rehabilitation planning and activities are implemented	Construction	-	N/A	No construction occurring during this audit period	Not required at this stage.
735:M14.4:2	Rehabilitation Management Plan - implementation	Implement the Rehabilitation Management Plan and subsequent revisions until such time as the completion criteria are met.	-	To ensure rehabilitation planning and activities are implemented	Operation	-	DBNGP Stage 5 Looping Expansion Project – 2011 Annual Environmental Compliance Audit (Strategen 2012a) DBNGP Flora and Vegetation Rehabilitation Monitoring: Stage 5A Loops 1 – 6 (Mattiske, March 2012)	Refer to Item 735:M14.2.	In process
735:M14.5	Rehabilitation Management Plan – public availability	Make the Rehabilitation Management Plan and subsequent revisions publicly available.	The revised requirement for making the Rehabilitation Management Plan publicly available is as follows: Carry out the following: 1) Provide a hard copy to the DEC library and 2) Make the Management Plan available on the DBNGP website.	To ensure the public is kept informed	Overall	-	DBNGP Stage 5 Expansion, Loop 10 Compliance Audit [Strategen, January 2008] DBNGP Stage 5 Expansion Looping Project DBPL00-501-0722—01 Construction Environmental Management Plan Revision Record DBNGP Stage 5 Expansion Looping Project [DBPL00-501-0722-01] Construction Environmental Management Plan (and Appendices) Controlled Version 2 Revision D (17 August 2011) DBP website (DBP 2011) copy at http://www.dbp.net.au/the-pipeline/expansion.aspx	Requirement previously considered 'Substantially in compliance'. No revision required during this audit period.	Completed in regards to original Plan Satisfactory during the period for latest revision of Plan
735:M15.1	Acid Sulphate Soils - investigations	Prior to the commencement of soil disturbance or dewatering in an area, undertake field investigations within that area to clearly delineate areas of high, high to medium, medium to low risk acid sulphate soils.	-	To identify those areas where acid sulphate soil management is required	Design Prior to the commencement of soil disturbance or dewatering in an area	DoE Acid Sulfate Soils Guideline Series (DoE 2006)	N/A	No design or construction occurring within this audit period	Not required at this stage
735:M15.2	Acid Sulphate Soils - Management	Ensure that within high, high to medium and medium to low acid sulphate soil risk areas, trenches will be excavated in lengths that permit trenches to be opened and closed within a 48 hour period.	Establish and implement auditing compliance reporting system.	To minimise adverse affects caused by acid sulphate soil disturbance	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M15.3	Acid Sulphate Soils and Dewatering Management Plan - prepare	Prepare an Acid Sulphate Soils and Dewatering Management Plan, in consultation with the DEC to the requirements of the Minister for the Environment on advice of the EPA.	Plan to demonstrate that all practical measures have been included to manage the potential impacts of acid sulphate soils and dewatering activities.	To ensure that there are no adverse impacts to sensitive receptors as a result of acid sulphate soil disturbance and dewatering	Design Prior to trenching and excavation activities	Criteria established by M15-3	DBNGP Stage 5 Looping Expansion Project – 2007 Annual Environmental Compliance Audit (DBP 2008)	Condition satisfied as reported in the 2007 annual compliance report (DBP 2008).	Cleared

Audit code	Subject	Action	How	Objective	Phase/Timing	Criteria	Evidence	Finding	Status
735:M15.4	Acid Sulphate Soils and Dewatering Management Plan – review and revise	Review and revise, as required, the Acid Sulphate Soils and Dewatering Management Plan.	-	To ensure best practice management	Construction	-	DBNGP Stage 5 Expansion Looping Project [DBPL00-501-0722-01] Construction Environmental Management Plan (and Appendices) Controlled Version 2 Revision D (17 August 2011) Revision Record	No revision required during this audit period.	Not required at this stage.
735:M15.5	Acid Sulphate Soils and Dewatering Management Plan - implementation	Implement and comply with the Acid Sulphate Soils and Dewatering Management Plan and subsequent revisions.	Incorporate in construction planning.	To ensure appropriate management actions are taken to minimise impacts from acid sulphate soil disturbance and dewatering	Construction	-	N/A	No construction occurring within this audit period.	Not required at this stage
735:M15.6	Acid Sulphate Soils and Dewatering Management Plan – public availability	Make the Acid Sulphate Soils and Dewatering Management Plan and subsequent revisions publicly available.	The revised requirement for making the Acid Sulphate Soils and Dewatering Management Plan publicly available is as follows: Carry out the following: 1) Provide a hard copy to the DEC library and 2) Make the Management Plan available on the DBNGP website.	To ensure the public is kept informed	Overall	-	DBNGP Stage 5 Expansion, Loop 10 Compliance Audit [Strategen, January 2008] DBNGP Stage 5 Expansion Looping Project [DBPL00-501-0722-01] Construction Environmental Management Plan (and Appendices) Controlled Version 2 Revision D (17 August 2011) DBP website (DBP 2011) copy at http://www.dbp.net.au/the-pipeline/expansion.aspx	Requirement previously considered 'Substantially in compliance' with regard to the original plan and the revised plan dated 22/10/2008. No revisions required during this audit period.	Completed in regards to original plan and revised plan dated 22/10/2008 Satisfactory during the period for latest revision
735:M16.1	Preliminary Decommissioning Plan - prepare	Prepare a Preliminary Decommissioning Plan for approval by the CEO.	The Plan shall describe the framework and strategies to ensure that the site is left in an environmentally acceptable condition, and provides: <ul style="list-style-type: none"> The rationale for the siting and design of plant and infrastructure as relevant to environmental protection. A conceptual description of the final landform at closure. A plan for a care and maintenance phase. Initial plans for the management of noxious materials. 	To appropriately decommission the DBNGP in accordance with regulatory requirements and accepted best practice environmental management	Design Prior to undertaking ground-disturbing activities	Criteria established by M16-1	DBNGP Stage 5 Looping Expansion Project – 2007 Annual Environmental Compliance Audit (DBP 2008)	Condition satisfied as reported in the 2007 annual compliance report (DBP 2008).	Cleared
735:M16.2	Final Decommissioning Plan – prepare and submit	At least 12 months prior to the anticipated date of closure, or at a time approved by the EPA, submit a Final Decommissioning Plan designed to ensure that the site is left in an environmentally acceptable condition prepared on advice of the EPA, for approval of the CEO.	The Final Decommissioning Plan shall set out procedures and measures for: <ul style="list-style-type: none"> Removal or, if appropriate, retention of plant and infrastructure agreed in consultation with relevant stakeholders. Rehabilitation of all disturbed areas to a standard suitable for the agreed new land use(s). Identification of contaminated area, including provision of evidence of notification and proposed management measures to relevant statutory authorities. 	To ensure that the site is left in an environmentally acceptable condition	Overall At least 12 months prior to anticipated closure	Criteria established by condition 16-2	Not yet relevant (not within 12 months of anticipated closure) Email correspondence from Tawake Rakai (22 January 2013)	Not yet relevant (not within 12 months of anticipated closure) Email correspondence verifying anticipated decommissioning date not within 12 months	Not required at this stage
735:M16.3	Final Decommissioning Plan - implementation	Implement the Final Decommissioning Plan until such time as the Minister for the Environment determines, on advice of the CEO, that decommissioning responsibilities have been fulfilled.	-	To ensure that the Final Decommissioning Plan is implemented	Closure	-	Not yet relevant (closure phase) Email correspondence from Tawake Rakai (22 January 2013)	Not yet relevant (closure phase) Email correspondence verifying anticipated decommissioning date not within 12 months	Not required at this stage

Audit code	Subject	Action	How	Objective	Phase/Timing	Criteria	Evidence	Finding	Status
735:M16.4	Final Decommissioning Plan – public availability	Make the Final Decommissioning Plan publicly available.	The revised requirement for making the Final Decommissioning Plan publicly available is as follows: Carry out the following: 1) Provide a hard copy to the DEC library and 2) Make the Management Plan available on the DBNGP website.	To ensure the public is kept informed	Overall	-	Not yet relevant (closure phase) Email correspondence from Tawake Rakai (22 January 2013)	Not yet relevant. Email correspondence verifying anticipated decommissioning date not within 12 months	Not required at this stage

6. Statement regarding compliance

An audit of the DBNGP project was undertaken to determine compliance with the conditions of Statement 735 during the period 14 December 2011 to 13 December 2012. No potential non-compliances with Statement No. 735 was identified by the auditors.

As no construction was undertaken during the reporting period, no Key Actions were considered relevant, and consequently there are no potential non-conformances.



Signature of Chief Executive Officer of DBNGP (WA) Nominees Pty Ltd:

Date:

14/3/13

7. References

- DBP 2008, *DBNGP Stage 5 Looping Expansion Project - DBPL00-506-0504-01 2007 Annual Environmental Compliance Report (Ministerial Statement No. 735)*, report prepared for DBNGP (WA) Nominees Pty Ltd by Strategen, Leederville, Western Australia.
- DBP 2011, *DBNGP Stage 5 Expansion Looping Project DBPL00-501-0722-01 Construction Environmental Management Plan - Controlled Version 2*, report prepared for DBNGP (WA) Nominees Pty Ltd by Strategen, Leederville, Western Australia.
- Department of Environment and Conservation (DEC) 2007, *Compliance Monitoring and Reporting Guidelines for Proponents - Performance and Compliance Reporting*, Draft prepared by Environmental Regulation Division, Department of Environment and Conservation, Perth, Western Australia.
- Mattiske Consulting Pty Ltd 2012a, *Dampier to Bunbury Natural Gas Pipeline (DBNGP) Flora and Vegetation Rehabilitation Monitoring: Stage 5a Loops 1–6*, Prepared for DBP (WA) Nominees by Mattiske Consulting Pty Ltd.
- Mattiske Consulting Pty Ltd 2012b, *Dampier to Bunbury Natural Gas Pipeline (DBNGP) Flora and Vegetation Rehabilitation Monitoring: Stage 5a Loops 0–6*, Prepared for DBP (WA) Nominees by Mattiske Consulting Pty Ltd.
- Mattiske Consulting Pty Ltd 2012c, *Dampier to Bunbury Natural Gas Pipeline (DBNGP) Flora and Vegetation Rehabilitation Monitoring: Stage 5b Loops 7–10*, Prepared for DBP (WA) Nominees by Mattiske Consulting Pty Ltd.
- Strategen 2006, *Dampier-Bunbury Natural Gas Pipeline Stage 5 Expansion - Environmental Impact Assessment*, report prepared for Alinta Asset Management by Strategen, Leederville, Western Australia.
- Strategen 2008, *Dampier-Bunbury Natural Gas Pipeline Stage 5 Expansion – Loop 10 Compliance Audit*, report prepared for Westnet Energy by Strategen, Leederville, Western Australia.
- Strategen 2010, *DBNGP Stage 5 Looping Expansion Project - 2009 Annual Environmental Compliance Report (Statement No. 735)*, report prepared for DBNGP (WA) Nominees Pty Ltd by Strategen, Leederville, Western Australia.
- Strategen 2011, *DBNGP Stage 5 Looping Expansion Project - 2010 Annual Environmental Compliance Report (Statement No. 735)*, report prepared for DBNGP (WA) Nominees Pty Ltd by Strategen, Leederville, Western Australia.
- Strategen 2012a, *DBNGP Stage 5 Looping Expansion Project- 2011 Annual Environmental Compliance Report (Statement No. 735)*, report prepared for DBNGP (WA) Nominees Pty Ltd by Strategen, Leederville, Western Australia.
- Strategen 2012b, *Dampier Bunbury Natural Gas Pipeline Stage 5 Looping Expansion Project Five-year Performance Review (2007-2012)*, report prepared for DBNGP (WA) Nominees Pty Ltd by Strategen, Leederville, Western Australia.
- Strategen 2012c, *Dampier Bunbury Natural Gas Pipeline Stage 5 Expansion – Stage 5B Loop 0 Fortescue River Crossing Compliance Audit*, report prepared for DBNGP (WA) Nominees Pty Ltd by Strategen, Leederville, Western Australia.