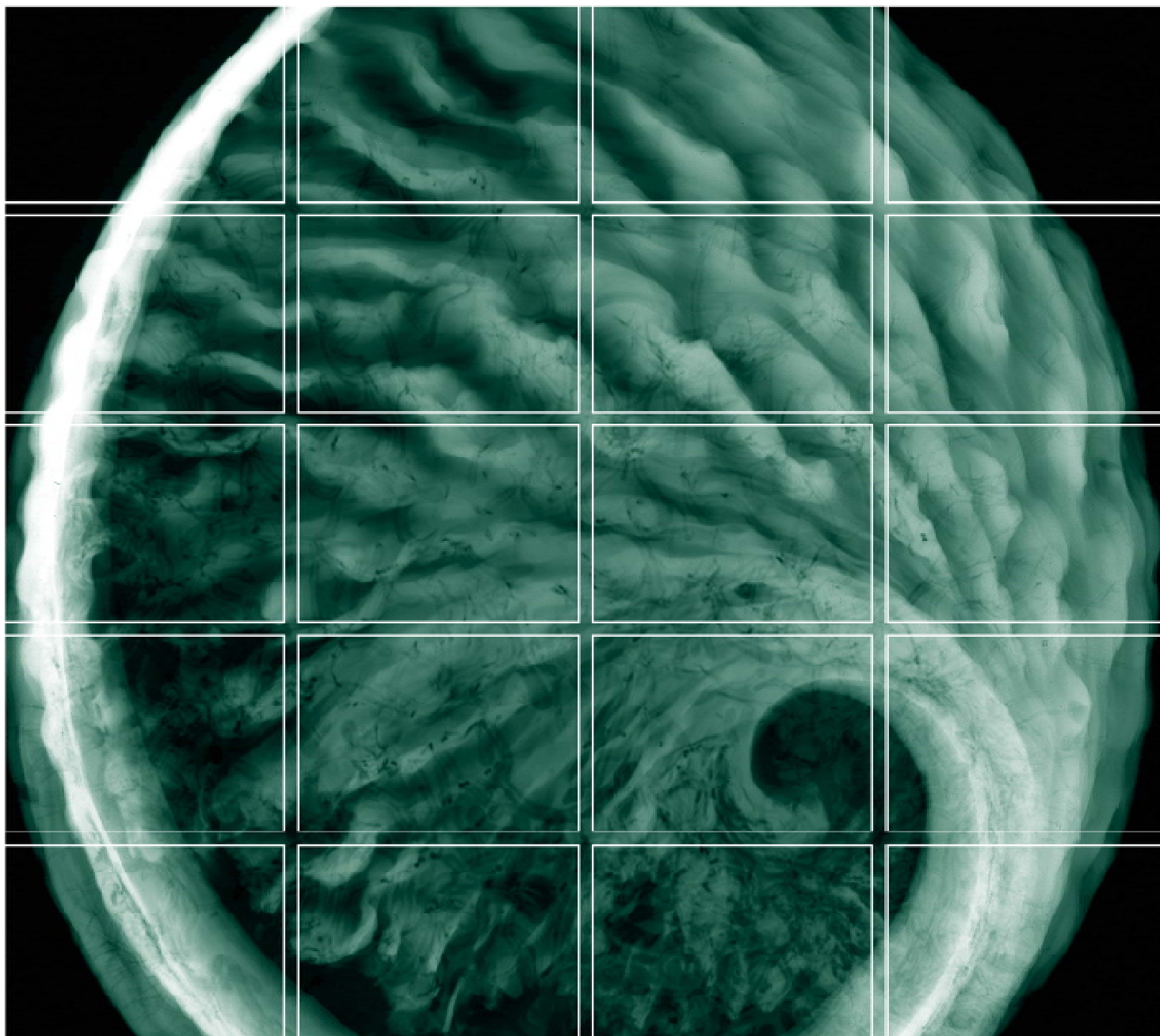




Environmental Compliance Audit

Ichthys Onshore LNG Facility

INPEX Operations Australia Pty Ltd

June 2016

0347649

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Environmental Compliance Audit

Ichthys Onshore LNG Facility

Environment Protection Approval (EPA 7-3)

FINAL Report

INPEX Operations Australia Pty Ltd

June 2016

ERM Document Reference: 0347649 RP01

www.erm.com

Prepared by:	Paul Fridell
Position:	Environmental Auditor (Appointed pursuant to the Environmental Protection Act 1970)
Signed:	
Date:	15 June 2016

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CONTENTS

1	<i>INTRODUCTION</i>	1
1.1	<i>THE AUDITED ACTIVITY</i>	1
1.2	<i>AUDIT PURPOSE AND OBJECTIVE</i>	2
1.3	<i>AUDIT SCOPE</i>	2
1.4	<i>AUDITOR</i>	3
2	<i>AUDIT METHODOLOGY</i>	4
2.1	<i>ACTIVITIES AUDITED</i>	4
2.2	<i>INPEX AND JKC PERSONNEL</i>	5
2.3	<i>AUDIT DATES AND MEETING SCHEDULE</i>	5
2.4	<i>SOURCES OF INFORMATION</i>	7
2.5	<i>COMPLIANCE AND IMPLEMENTATION DESCRIPTIONS</i>	7
3	<i>KEY FINDINGS</i>	9
3.1	<i>NON-COMPLIANCES 2015-2016</i>	9
3.2	<i>OBSERVATIONS 2015-2016</i>	11
4	<i>CONCLUSIONS AND RECOMMENDATIONS</i>	12
5	<i>LIMITATIONS</i>	13

Annexes

Annex A: EPA 7-3 Approval Conditions

Annex B: INPEX Terms of Reference and NT EPA Approval

Annex C: Audit Evidence Tables

Annex D: Statutory Declaration

In April 2016, Environmental Resources Management Australia Pty Ltd (ERM) was engaged by INPEX Operations Australia Pty Ltd (INPEX) to undertake an annual audit focussed on the approval conditions for NT EPA Environment Protection Approval 7-3 (EPA7-3) (refer to *Annex A*), Waste Management and Pollution Control Act (WMPC Act) and Water Act and the Contractor's Construction Environmental Management Plan (CEMP) (Revision 17) in accordance with the NT EPA approved Audit Scope. INPEX Operations Australia Pty. Ltd. is acting on behalf of Ichthys LNG Pty. Ltd. as the Approval Holder.

INPEX as the proponent of the Ichthys development have engaged JKC Australia LNG Pty Ltd (JKC) as the primary contractor. JKC prepared the CEMP with reference to the conditions set by the Commonwealth and the recommendations made by the Northern Territory government. The CEMP details the environmental protection management measures and controls necessary to avoid, reduce or mitigate the environmental impacts during the construction of the onshore LNG facilities.

1.1

THE AUDITED ACTIVITY

The Ichthys natural gas field is located in the Browse Basin, around 450 km north-north-east of Broome and 820 km west-south-west of Darwin. The natural gas will be directed from the Ichthys Field through a seabed pipeline to the onshore two-train 8.4 Mt/annum LNG processing plant at Bladin Point in Darwin Harbour for processing into liquefied natural gas (LNG) and liquefied petroleum gas (LPG).

CEMP Revision 17 addresses the environmental impacts and mitigation measures related to the construction of the onshore LNG facilities and its associated infrastructure within the site boundary as shown in *Figure 1.1* below.

New construction activities addressed in this revision of the CEMP Revision 17 include:

- Hydrostatic testing;
- Nearshore infrastructure construction; and
- Pre-commissioning works.

The CEMP is not applicable to the EMA, accommodation village, dredging, offshore construction, overseas fabrication yards, domestic Australian Vendors' workplaces and transport of equipment, fill and rock material to the site.



Figure 1.1 Site Area Boundary (CEMP, REV 17).

1.2 AUDIT PURPOSE AND OBJECTIVE

Condition 18 of EPA7-3 requires annual environmental audits be conducted by a “qualified person” to evaluate INPEX compliance against EPA7-3. Condition 18 of the approval states:

- *“An annual environmental audit must be undertaken by a qualified person to evaluate compliance with:*
- *this Approval;*
- *the Waste Management and Pollution Control Act; and*
- *the Water Act.”*

The Northern Territory Government has deemed Environmental Auditors appointed by the Victorian EPA pursuant to the Environment Protection Act 1970 (Victoria) as “qualified persons”.

The objective of the audit was to seek both documented and visual evidence from INPEX and JKC to ensure compliance with EPA7-3 and implementation of CEMP environmental mitigation measures as they relate to the operations at the time of the audit.

1.3 AUDIT SCOPE

Pursuant to Condition 19 of EPA7-3, the proposed scope for the environmental audit (INPEX Document No: CO75 - IPX- NRY-LE-00215) was

submitted to the NT EPA for review and approval on 26 February 2016, no later than 20 Business days prior to the specified commencement date of the environmental audit (18 to 22 April 2016).

Formal written approval of the audit scope was received on 11 April 2016 (NT EPA Ref: EN2011/0234-03~0172). A copy of the audit scope and NT EPA approval letter is included in *Annex B*.

The audit was undertaken during the week of 18 April – 22 April 2016. This audit is the fourth annual audit completed pursuant to Condition 18 since the issue of the original EPA7-3 on 19 April 2012.

1.4 AUDITOR

Mr Paul Fridell of ERM completed the audit as a “qualified person”. Mr. Fridell is an appointed Environmental Auditor pursuant to the *Victorian Environment Protection Act 1970* and is therefore eligible to undertake the audit. Mr Fridell has approximately 19 years environmental consulting experience including the development of and assessment of compliance with Environmental Management Plans in multiple states across Australia.

Mr Fridell’s specific previous experience related to the Ichthys onshore works includes independent “qualified person” reviews of Revisions 7, 11 and 16 of the CEMP pursuant to condition 12.2 of EPA7-3 prior to submission to NT EPA, and the previous independent “qualified person” EPA7-3 audit in April 2015.

In addition to involvement in the onshore works, Mr Fridell has also completed five “qualified person” audits of the Ichthys project Darwin Harbour East Arm dredging activities under EPA8 (November 2012, April 2013, December 2013, June 2014 and February 2016) and the “qualified person” audit for the Ichthys project Gas Export Pipeline (GEP) dredging under EPA9 (March 2014).

Mr Tim Haydon and Mr Chris Ford of ERM assisted in the audit data review and report writing. Mr Haydon is a certified professional in erosion and sediment control (CPESC) and was used as the auditor’s expert in this area of the compliance audit. Mr Ford is an environmental consultant based in the ERM Melbourne office.

2.1

ACTIVITIES AUDITED

Due to the numerous activities being undertaken across the site by a large number of subcontractors, once on-site the qualified person made the decision to undertake a detailed audit of a small number of higher risk activities.

In assessing compliance with EPA7-3 in 2016, in addition to an overall compliance audit as required by the NT EPA approved scope, the audit team specifically focused on the following:

- Waste water discharge and waste management procedures including the re-use and disposal of spent hydrotest water as required by the NT EPA scope approval;
- The new variation management process outlined in CEMP Rev 17 Section 5.2, for evidence of compliance against this procedure when assessing compliance with Conditions 11 & 12;
- The MYOSH reporting system and how non-compliances and incidents are being tracked and reported.

Following up on findings from the last audit, recent incidents, the risk assessment included in the CEMP (moderate residual risks) and in consideration of the new activities in the CEMP (revision 17) the following activities and mitigation measures on-site were a focus in the audit:

Activities:

- Hydrostatic testing (new activity);
- Earthworks and Ground Improvement - Erosion sediment control implementation and removal; and
- General construction works.

CEMP Risk Mitigation Measures:

- Section 6.4: Surface water management, especially any discharge of PWC sourced hydrotest water to reticulating drain;
- Section 6.5: Erosion and Sediment Control over the last wet season;
- Section 6.6: Acid Sulphate soils;
- Section 6.12: Waste Management;
- Section 6.13: Hazardous Materials Storage; and

- Section 6.14 Spill Prevention and Response (in context of recent Tridol/Expandol incident) plus follow up on other spills identified in last 12 months.

In assessing implementation of the management strategies the audit team also reviewed current monitoring data over the last 12 months (AEMR and quarterly reporting) to understand how any impacts may have informed strategy performance.

All documentation relevant to the audit was provided to the qualified person for review, as requested. INPEX and JKC documentation was, in general, provided in electronic version when required for sighting and the audit programme allowed sufficient time for the audit team to become familiar with these documents.

2.2 *INPEX AND JKC PERSONNEL*

The qualified person was supported by one or more subject matter experts from both INPEX and JKC (Contractor), these individuals and their titles are listed below:

- Pippa Manning, INPEX Lead Environmental Advisor
- Jacques Jansen Van Rensburg, INPEX Senior Environmental Advisor;
- Suzanne Mayne, Contractor Project Environmental Manager;
- Anthony Black, Contractor Environmental Advisor;
- Andrew Robertson, Contractor Environmental Advisor, (GEP-1 and TNK-2 Package);
- Thomas Giltrap, Contractor Environmental Advisor;
- Brendan Spencer, Contractor Project HSSE Compliance Manager;
- Ernest Yap, Contractor Lead Environmental Engineer (MEC-2);
- Katrina Korbelova, Contractor Associate Environmental Advisor;

2.3 *AUDIT DATES AND MEETING SCHEDULE*

Following site inductions, the audit was undertaken on-site in the INPEX site office meeting room from 9:30am Monday 18 April until 3:30 pm Friday 22 April 2016.

Table 2.1 April 2016 Audit Schedule

Date	Location	Interview Attendees	Description
18 April 2016	JKC, Site,	PF, CF, TH, JR, PM, SM, AR, TG, KK, AB.	Opening meeting, initial meeting with INPEX, and qualified person undertook site inspection with INPEX and JKC.
19 April 2016	Site, JKC, INPEX	PF, CF, TH, PM, JR, SM, AR, TG, RB, GO, EY, TT.	Site visits to the TNK-2, MEC-2, BLD-1 and GEP Package areas, including interviews with TNK-2 and MEC-2 sub-contractors. (Interviews were focussing on implementation of erosion sediment controls in the GEP and BLD-1 packages and spent hydrotest water in the TNK-2 and MEC-2 Packages). Interview with INPEX and JKC regarding incident reporting for the Tridol spill incident.
20 April 2016	JKC, Tank - 2, Waste treatment	PF, CF, JR, PM, SM, AB, EY, LD.	Interview of JKC team assessing site wide surface water management in the morning and storage and management of dangerous goods onsite and spill prevention and response in the afternoon. Site visit to OPS-1 workshop and JKC warehouse with interview of pertinent OPS-1 and JKC personnel.
21 April 2016	JKC	PF, CF, JR, PM, AM, SM, RH, KK, BS, ET, DM, NG.	Interviews with INPEX, JKC and WST-1 personnel (focussing on waste management in the morning and EPA 7.3 approval conditions, incident management and reporting and auditing, reporting and communication in the afternoon).
22 April 2016	JKC,	PF, CF, JR, AB, SM, KK, AR.	Interview with relevant JKC personal to discuss the environmental monitoring program and results and Close out meeting.

1. PF: Paul Fridell (ERM), CF: Chris Ford (ERM), TH: Tim Haydon (ERM), PM: Pippa Manning (INPEX), JR: Jacques Jansen Van Rensburg (INPEX); GO: Greg Oliver (INPEX); SM: Suzanne Mayne (JKC); AR: Andy Robertson (JKC), AB: Anthony Black (JKC), TG: Thomas Giltrap (JKC), BS: Brendan Spencer (JKC); EY: Ernest Yap (JKC) AM: Alan Mitchell (JKC), RB: Ron Billyard (MKT); DM: David Murphy (Veolia); RH: Reese Hitchcock (OPS-1); TT: Toby Todhunter (CB&I); ET: Eden Turner (JKC); KZ: Kresho Zic (JKC); LD: Luke Denneys (JKC); NG: Natalia Gomez (OPS-1).

2. INPEX: INPEX Office, 144 Wickham Point Road, Wickham, Darwin, Northern Territory;

3. JKC: JKC Office, 144 Wickham Point Road, Bladin Point, Darwin, Northern Territory;

2.4

SOURCES OF INFORMATION

The Qualified Person sought evidence of compliance through interviews with key INPEX and JKC personnel, site inspections and recording of field observations and the examination and compilation of key documents, data and records (where possible) to verify compliance. Sources of information included, but are not limited to, the following:

- INPEX Ichthys Project website;
- INPEX and JKC management plans, procedures and reports, Draft EIS and Supplement to Draft EIS;
- JKC CEMP;
- Approval letter(s) from the NT EPA;
- Environmental Monitoring reports;
- MYOSH Reporting System; and
- JKC incident registers, spreadsheets, plans, reports, meeting minutes, letters.

All evidence related to compliance with the conditions within EPA7-3 and the CEMP that demonstrate conformance or non-conformance has been recorded against the applicable criterion on the checklist in *Annex C*.

2.5

COMPLIANCE AND IMPLEMENTATION DESCRIPTIONS

In assessing INPEX's compliance with EPA7-3 conditions and the CEMP, the Qualified Person made an assessment as to the degree of compliance with the condition based on the evidence provided for sighting and provided a ranking for each condition based on the ranking included in the NT EPA approved Audit Scope.

The INPEX procedure allows for the Qualified Person to make Observations (O) in addition to assessment of compliance (A), non-conformance (N) and critical non-conformance (C).

The Qualified Person deemed an observation (O) conformance ranking necessary when there was no evidence of a non-conformance at the time of the audit, however, it was deemed by the Qualified Person that there was a reasonable probability that a non-conformance could occur in the future if corrective actions were not implemented. The Qualified Person therefore deems that actions resulting from an O conformance ranking must be addressed prior to the next audit.

The INPEX ranking is presented below in *Table 2.2*

Table 2.2 *Audit Scope Conformance Ratings*

Conformance Rating	Description
A	Acceptable, no action required.
O	Observations noted, response required with proposed action and timing within agreed timeframes.
N	Non-conformance requiring corrective action within agreed timeframes.
C	Critical non-conformance requiring immediate corrective action.
N/A	Not applicable.

The audit was conducted using a number of audit checklists consistent with those provided in the NT EPA approved audit scope including Table 2-1 - EPA7-3 Conditions, Table 2-2 Environmental Commitments. The auditor also developed a third checklist (Table 2-3) to assess compliance against key CEMP mitigation measures.

In summary the key findings to highlight from this audit are:

- A significant improvement in the transparent systemic logging, assessing and closing out of non-compliances (including those assessed as trivial or negligible) and environmental incidents through the MYOSH system;
- A significant improvement in the transparency of tracking listed wastes;
- A significant improvement in implementation of erosion and sediment control management during the 2015-2016 wet season;
- Measures to address the non-compliances that resulted in the Tridol / Expandol spill in October 2015 have already been implemented.

As a result of these improvements over the last 12 months, it was the first time that the project has achieved full compliance against EPA7 conditions. One observation was recorded against EPA7 (Condition 16) noting the potential to investigate and improve the reuse or recycling of stormwater and waste concrete.

3.1

NON-COMPLIANCES 2015-2016

The audit identified a number of non-compliances with the CEMP mitigation measures. A summary of the non-compliances with the CEMP are summarised below:

- **CEMP Mitigation Measure 6.4.38:** The auditor sighted a report to NT EPA dated 8 April 2016 which highlighted a number of non-compliances with water quality objectives specified in Condition 13 of WDL192 in September 2015, January 2016 and March 2016. The delay in reporting is considered a non-conformance against Condition 19 of WDL192 requiring notification of non-compliances within 24 hours to NT EPA.
- **CEMP Mitigation Measure 6.4.41:** Prior to issuing a water discharge permit for construction water, the CEMP (Tables 6.4.3 and 6.4.4) require an assessment of the potential for the water to be contaminated. Where there is potential for contamination then additional relevant analytical testing is to be completed. Based on the auditor's review of the current water discharge permit format, this contamination assessment appears to have been distilled down to a visual check for hydrocarbon sheen only. The structure of the permit does not encourage the permit authoriser to ask for,

or the permit requester to provide, relevant information about the potential for contamination other than hydrocarbon sheens (e.g. dissolved phase metals). A number of permits were identified where it was not clear that any contamination risk assessment other than a visual inspection for sheen had been completed when in the opinion of the auditor a more thorough risk assessment was required (e.g. a permit for discharge of accumulated water from the hazardous waste storage area) to meet the surface water management objectives and targets in the CEMP (Table 6.4.2).

- **CEMP Mitigation Measure 6.4.42:** Prior to hydrotest water being reused on site it is required to be compliant with water quality criteria in CEMP Table 6.4.6. Compliance can be achieved through individual testing of each discharge or the Water Discharge Procedure (L290-AB-PRC-10265) Section 7.3.2 allows a characterisation study to be completed to reduce the amount of testing required for pipes, vessels or tanks made of the same material with the same coatings. Table 7.1 of the procedure specifies the required testing suite for a characterisation study depending on pipe material. The auditor identified that approximately 50,000L of hydrotest water from a carbon steel pipe had been reused on-site. A characterisation study had been undertaken however sampling was not undertaken in accordance with Table 7.1 of procedure. The characterisation study completed in August 2015 indicated that TRH was present in the hydrotest water attributable to lube application. Changes in lube application resulted in a reduction of TRH results in hydrotest water. On the basis that a reduction in the TRH concentration was achieved by changing the lube method no subsequent discharge permit for reuse required TRH testing. As the resultant reduction in the TRH concentrations were directly linked to the change in method, it is the auditor's opinion that all subsequent permits should have identified a potential risk of TRH contamination, specifically referenced the change in method and verified the method implementation with verification TRH sampling prior to reuse discharge.
- **CEMP Mitigation Measure 6.4.45:** This measure requires the collection of water samples to be performed by suitably qualified environmental or water-quality professionals and specifies a level of QA/QC. In addition Section 7.2 of the Water Discharge Procedure (L290-AB-PRC-10265) outlines similar requirements. No evidence was provided to demonstrate the level of competency of the subcontractor taking compliance tests prior to hydrotest discharge. There was also an absence of duplicate/rinsate samples taken by the subcontractor at 100% fill level prior to discharge of hydrotest water under WDL211 to the MOF outfall.
- **CEMP Mitigation Measures 6.13.05. & 6.13.12:** An incident was reported to NT EPA following a spill of expandol and tridol firefighting foam in October 2015. During the audit it was determined that the chemical was on-site prior to the completion of the ChemAlert review process in November 2015. During questioning it was made known that some chemicals used to be quarantined on-site prior to approval. Prior to the chemical being approved in ChemAlert the primary and containment and

labelling of the chemical were not appropriate. The auditor deemed that these non-compliances were key contributing factors to the incident. It is noted however that since the incident there has been an increased focus on following this process and increased attention to use of ChemAlert such that at the time of the audit a number of remedial measures had been implemented to ensure compliance with these measures.

3.2

OBSERVATIONS 2015-2016

The audit identified a number of observations with EPA7 and CEMP mitigation measures. A summary of the key observations are summarised below:

- **EPA7 Condition 16:** Over the last audit period the greatest number of Discharge Water Permits has permitted water to be discharged to the flare pad basin. Due to the additional testing requirements for on-site reuse of water, it is more expedient to discharge rather than reuse which is counter to the intention of this condition. Large stockpiles of waste concrete were observed on-site (CVL-4) which was explained as a contractual issue. Reuse options for concrete being considered for reuse on-site.
- **CEMP Mitigation Measure 6.4.19:** Potable water supply is monitored monthly for total metals by Greencap at the mains location at front of site which demonstrate a high variability in copper and zinc concentrations. For hydrotesting source water it is more critical that filtered metals be taken for improved understanding of dissolved (filtered) copper and zinc concentrations.
- **CEMP Mitigation Measure 6.5.08:** The beach valve area was an area of concern during the inspection. Maintenance to the sediment fence adjacent to the access track was required, a drainage line with check dams required desilting and perimeter rock berms contained gaps.
- **CEMP Mitigation Measure 6.13.04:** The assessment procedure for adverse environmental impacts associated with chemical selection is not appropriately documented to ensure the assessment is consistent.
- **CEMP Mitigation Measure 6.13.08:** Antifouling paint containing tributyltin (TBT) is not included on the prohibition list.
- **CEMP Mitigation Measure 6.13.10 and 6.13.13:** Noted that there is an increased demand for chemical storage areas on-site and that some areas may be retro fitted to meet applicable standards and guidelines. An example is the use of the waste transfer area for chemical storage. It is noted that a risk assessment was completed in June 2015 which identified a number of modifications to the waste storage area to make it suitable for chemical storage during the wet season, however the modifications were not made until April 2016 (after the wet season).

CONCLUSIONS AND RECOMMENDATIONS

A number of improvements were noted over the last 12 months such that the project has achieved full compliance against EPA7 conditions with the exception of one observation (Condition 16) for improvement through investigating the reuse or recycling of stormwater and waste concrete.

A number of non-compliances with CEMP mitigation measures were identified related to elements of hydrotesting discharge procedures, water discharge permitting, chemical storage, spill management and WDL non-compliance reporting.

In addition to rectifying non-compliances with existing systems, opportunities for improvement of the procedures and systems were identified in the following areas:

1. Amending the Water Discharge Permit format to require a more rigorous and transparent assessment of potential for contamination of construction water triggering the need for testing where required prior to the issue of the permit. The assessment on the permit should note a more accurate location description, if there have been any recent spills in the area and/or are chemicals currently or have they formerly been stored in the area.
2. Amending the Water Discharge Procedure (L290-AB-PRC-10265) to require appropriate verification sampling to be undertaken following a characterisation study where exceedances were identified.
3. Review and assess the potential for reuse of uncontaminated stormwater for dust suppression rather than readily discharging to the flare-pad basin.
4. Sample potable PWC water for dissolved metals;
5. Prepare and formalise a procedure for the assessment of environmental impact of chemicals as part of the ChemAlert review process;
6. Include tributyltin compounds on the prohibition list;
7. Prior to issue of a Water Discharge Permit for hydrotest water, the permit is to note that the nominated water sampler and the proposed quality assurance and quality control procedures (duplicates and blanks) to be undertaken by subcontractor and/or contractor.

LIMITATIONS

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Yours sincerely,
for Environmental Resources Management Australia Pty Ltd

A handwritten signature in black ink, appearing to read 'Paul Fridell', is positioned above the printed name.

Paul Fridell
Qualified Person
*(in accord with NT Waste Management and
Pollution Control Act)*

Annexes

- Annex A: EPA 7-3 Approval Conditions
- Annex B: INPEX Terms of Reference and NT EPA Approval
- Annex C: Audit Evidence Tables
- Annex D: Statutory Declaration

Annex A

EPA 7-3 Approval Conditions

ENVIRONMENT PROTECTION APPROVAL

(Pursuant to section 34 of the *Waste Management and Pollution Control Act*)

Approval Details

Approval Number: **EPA7-3**
Commencement Date: 19 April 2012
Amendment Date: 29 August 2014
Expiry Date: 19 April 2017

Approval Holder

Legal Entity Name: Ichthys LNG Pty Ltd
ABN: 42 150 217 299
ACN: 150 217 299
Registered Business Address: Level 22, 100 St Georges Terrace, Perth WA 6000
Postal Address: Level 22, 100 St Georges Terrace, Perth WA 6000
Contact Person: Sandy Griffin
Position Title: Environmental Approvals Coordinator
Contact Details: (08) 6213 6860
mobile: 0417 286 356
email: Sandy.Griffin@inpx.com.au

Location of Premises

Address: NT Portion 07002, 144 Wickham Point Road, Wickham NT 0822.
Section 1901 and Section 1896, Hundred of Ayers, Wickham NT 0822.
1000 Channel Island Rd, Wickham NT, 0822.
Telephone Numbers: (08) 8924 3200
mobile: 0419 243 936

24 hour emergency response

Contact Person: Duty Manager
mobile: 0418 237 232

Approved activity

Constructing, installing and carrying out works in relation to premises for processing hydrocarbons so as to produce, store and despatch liquefied natural gas or methanol pursuant to Schedule 2, Part 1 (3) of the Act.

Being the activity particularly described in INPEX, Ichthys Project, Ichthys Onshore LNG Facilities Construction Environmental Management Plan (Company document L290-AH-PLN-0059) as revised (subject to approval by the Administering Agency as provided for in this Approval).

ENVIRONMENT PROTECTION APPROVAL (EPA7-3)

TABLE OF CONTENTS

TABLE OF CONTENTS	2
INFORMATION ABOUT THIS APPROVAL.....	3
Definitions of Terms.....	3
Responsibilities of Approval Holder.....	3
Amendment or Revocation of Approval (section 37 of the WMPCA).....	3
Transfer of Approval (section 46 of the WMPCA)	3
Duration of Approval (section 41 of the WMPCA).....	3
Public Register	3
Supporting Guidelines and Documents.....	4
Environment Protection Objectives (Part 4 of the WMPCA)	4
Environmental Interests.....	4
APPROVAL CONDITIONS	5
Administrative	5
Operational	5
Environmental Audit(s)	7
Monitoring	7
Reporting	7
DEFINITIONS.....	9
APPENDIX 1	10

ENVIRONMENT PROTECTION APPROVAL (EPA7-3)

INFORMATION ABOUT THIS APPROVAL

Definitions of Terms

- A section on the definition of terms used in this Approval can be found at the end of the Approval.
- Terms used in this Approval which are defined in the *Waste Management and Pollution Control Act* (WMPCA) have the meaning given in that Act unless specifically indicated otherwise.

Responsibilities of Approval Holder

- It is an offence under the *Waste Management and Pollution Control Act*, for the Approval Holder to contravene or fail to comply with the conditions of their environment protection approval.
- In addition to the conditions set out in this Approval, general responsibilities of Approval Holders are set out in the *Waste Management and Pollution Control Act* and Regulations and the *Water Act*. Approval Holders must comply at all times with the requirements of these Acts and all other applicable laws.
- Without limiting the conditions of this Approval, in conducting the approved activity, the Approval Holder must do all things reasonable and practicable to:
 - prevent or minimise the likelihood of pollution occurring as a result of, or in connection with, the Activity;
 - prevent or minimise the likelihood of environmental harm occurring as a result of, or in connection with, the Activity;
 - effectively respond to pollution and the risk of pollution occurring as a result of, or in connection with, the Activity;
 - effectively respond to environmental harm and the risk of environmental harm occurring as a result of or in connection with the Activity; and
 - as far as practicable:
 - avoid and reduce waste produced as a result of, or in connection with the Activity;
 - increase the re-use and recycling of waste;
 - effectively manage waste disposal; and
 - apply the principles of ecologically sustainable development.

Amendment or Revocation of Approval (section 37 of the WMPCA)

- The Approval Holder can apply to vary the conditions of this Approval.
- Fees apply and an application form for this purpose is available from the Department's website.
- The issuing authority may also vary licenses as set out in section 38 of the Act.

Transfer of Approval (section 46 of the WMPCA)

- The Approval Holder can apply to transfer this Approval to another person.
- Fees apply and an application form for this purpose is available from the Department's website.

Duration of Approval (section 41 of the WMPCA)

- This Approval will remain in force until its expiry date, or until a licence comes into force in relation to the premises, whichever occurs first.
- An Approval Holder may apply for an extension or reduction to the duration of the Approval.

Public Register

- A copy of this Approval and any plans for environmental management provided in accordance with a condition of this Approval will be placed on a register in accordance with section 9 of the *Waste Management and Pollution Control Act*.
- The register is publicly available for viewing on the Department's website.

ENVIRONMENT PROTECTION APPROVAL (EPA7-3)

- A copy of the Annual Audit and Compliance Report will also be placed on the register.

Supporting Guidelines and Documents

This Approval has been developed based on the information provided by the Approval Holder in the following documentation:

- Application for Environment Protection Approval dated 15 November 2011 - INPEX Ichthys Project, Ichthys Onshore LNG Facilities Construction Environmental Management Plan Company Doc. No. L290-AH-PLN-0059;
- Report, Third Party Review Project Ichthys CEMP, 7 March 2012;
- Department of Natural Resources, Environment, The Arts and Sports, Environment Assessment Report 65, Ichthys Gas Field Development Project, Blaydin Point, INPEX Browse Ltd, Environmental Assessment Report and Recommendations by the Environment and Heritage Division, NRETAS, May 2011;
- Northern Territory of Australia, Development Permit DP12/0065, Section 01890 and Section 01814 Hundred of Ayers, 1000 Channel Island Road, Wickham and 1232 Channel Island Road, Wickham, and Adjacent Crown Land and Adjacent section of Darwin Harbour;
- Northern Territory of Australia Development Permit DP13/0501, Section 01890 and Section 01901 Hundred of Ayers, Wickham, NT 0822; and
- INPEX Operations Australia Pty Ltd, application to amend Condition 10 of EPA7-2 dated 8 May 2014

Environment Protection Objectives (Part 4 of the WMPCA)

An Environment Protection Objective (EPO) is a statutory instrument to establish principles on which:

- a) environmental quality is to be maintained, enhanced, managed or protected;
- b) pollution, or environmental harm resulting from pollution, is to be assessed, prevented, reduced, controlled, rectified or cleaned up; and
- c) effective water management is to be implemented or evaluated.

In accordance with section 18 of the *Waste Management and Pollution Control Act* a beneficial use, quality standard, criteria or objective declared under section 73 of the *Water Act* and in force is an environment protection objective for the purposes of the Act.

The following EPOs are relevant to this Approval:

- Declaration of Beneficial Uses and Objectives, Darwin Harbour Region, Northern Territory Government Gazette No. G27, 7 July 2010.
- Declaration of Beneficial Uses and Objectives, Elizabeth-Howard Rivers Region Groundwater, Northern Territory Government Gazette No. G27, 7 July 2010.

Environmental Interests

In addition to EPOs relevant to this Approval, this section highlights particular sensitivities of the surrounding land use and environment associated with the location of the approved activity that represents an interest to the Northern Territory Government and the community.

- Sites of Conservation Significance, SOCS Number 6, (NT Parks and Conservation Masterplan Map Number 12)

ENVIRONMENT PROTECTION APPROVAL (EPA7-3)

APPROVAL CONDITIONS

Administrative

1. The Approval Holder must notify the Administering Agency within 24 hours if there are changes to the details of the 24 hour emergency contact as provided on page one of this Approval.
2. The Approval Holder must notify the Administering Agency within 14 days if there are changes to the Approval Holder details as provided on page one of this Approval.
3. The Approval Holder must cause clear and legible signage to be displayed in a prominent location at the primary road entrance to the Location including the following details:
 - 3.1. Environment Protection Approval number issued under the *Waste Management and Pollution Control Act*; and
 - 3.2. The 24 hour emergency contact details as provided on page one of this Approval or as amended in accordance with this Approval.
4. The Approval Holder must cause a copy of this Approval to be available at all times:
 - 4.1. on the Approval Holder's Australian website; and
 - 4.2. at the Location.
5. Where this Approval requires the provision of any notice, document or other correspondence to the Administering Agency, the relevant contact is:

Pollution Control

Physical Address: Level 2 Darwin Plaza, 41 Smith Street Mall, Darwin NT 0800

Postal Address: GPO Box 3675, DARWIN NT 0801

Email: pollution@nt.gov.au
6. All notices, documents or other correspondence required to be provided pursuant to this Approval must be provided in electronic form unless otherwise specified as a condition of this Approval.

Operational

7. The Approval Holder must at a minimum:
 - 7.1. implement and comply with:
 - INPEX, Ichthys Project, Ichthys Onshore LNG Facilities Construction Environmental Management Plan (Company document number L290-AH-PLN-0059) (CEMP), as revised and approved by the NT EPA;
 - 7.2. comply with all applicable laws; and
 - 7.3. comply with all permits and approvals issued in relation to the Activity.
8. The Approval Holder must, without limiting any other condition of this Approval, in conducting the Activity, do all things reasonable and practicable to ensure the Activity does not adversely affect the Declared Beneficial Uses and Objectives as declared from time to time, including those applying to:
 - 8.1. the Elizabeth-Howard Rivers Region Groundwater; and
 - 8.2. the Darwin Harbour Region.
9. The Approval Holder must cause a copy of the current CEMP to be:
 - 9.1. available on the Approval Holder's Australian website; and
 - 9.2. provided to the Administering Agency.

ENVIRONMENT PROTECTION APPROVAL (EPA7-3)

10. The Approval Holder must:
 - 10.1 Submit all revisions of the CEMP to the Administering Agency for approval, other than minor revisions involving changes such as typographical changes or revisions to formatting and referencing to other documents; and
 - 10.2 Submit a revised copy of the CEMP to the Administering Agency for information, when the revision has incorporated only minor changes, such as typographical or formatting changes or referencing to other documents.
11. The CEMP must be revised and approved by the to the Administering Agency prior to commencing any works that are not addressed in an approved CEMP and will or may cause or increase the potential for environmental harm, such as by any increase of emissions or discharges.
12. Each revision of the CEMP must:
 - 12.1 Address all works that will be conducted prior to approval of the next revision of the CEMP;
 - 12.2 Be reviewed and endorsed by a qualified person as meeting the requirements of the *Waste Management and Pollution Control Act*, prior to submission to the Administering Agency; and
 - 12.3 Be submitted to the Administering Agency for review (with a copy of the qualified person's certified review), at least 30 business days prior to implementation, noting the Administering Agency may require the Approval Holder to revise, amend and resubmit the CEMP.
13. The Approval Holder must maintain and operate a 24 hour community telephone contact number and must ensure that the telephone number is provided:
 - 13.1 in a prominent location on the Approval Holder's Australian website; and
 - 13.2 in other publicly available documents relating to the Activity.
14. The Approval Holder must maintain a log of all complaints made, in relation to the Activity, to any persons involved in the Activity.

The log must include details of the following:

 - the date and time of the complaint;
 - the contact details of the complainant if known, or where no details are provided a note to that effect;
 - the nature of the complaint;
 - the nature of events giving rise to the complaint;
 - prevailing weather conditions at the time of the complaint;
 - the action taken in relation to the complaint, including any investigation or follow-up contact with the complainant; and
 - if no action was taken, why no action was taken.

The log must be retained for the duration of this Approval.
15. The Approval Holder must maintain a log of events causing or threatening to cause pollution including, but not limited to, fires, accidental spillages and discharges to Darwin Harbour.
16. The Approval Holder must segregate waste for recycling, reuse or disposal.
17. The Approval Holder must keep records of listed waste in accordance with Regulation 11 of the *Waste Management and Pollution Control (Administration) Regulations*.

ENVIRONMENT PROTECTION APPROVAL (EPA7-3)

Environmental Audit(s)

18. An annual environmental audit must be undertaken by a qualified person to evaluate compliance with:
 - this Approval;
 - the *Waste Management and Pollution Control Act*; and
 - the *Water Act*.
19. The proposed scope for the environmental audit must be submitted, no later than 20 Business days prior to the proposed commencement date of the environmental audit (which must be specified when the proposed scope is submitted), to the Administering Agency for review and approval.
20. The environmental audit must not commence until written approval is received from the Administering Agency noting that the Administering Agency may require the Approval Holder to revise, amend or resubmit the proposed scope.
21. The environmental audit report must be:
 - 21.1 completed within two calendar months of receipt of approval from the Administering Agency unless otherwise agreed;
 - 21.2 signed by the qualified person conducting the audit; and
 - 21.3 provided in full to the Administering Agency within five Business Days of being signed by the qualified person conducting the audit.

Monitoring

22. The Approval Holder must submit a monitoring plan to assess environmental impacts of the Activity to the Administering Agency by 1 June 2012.

The monitoring plan must be:

 - 22.1 approved by the Administering Agency, noting that the Administering Agency may require the Approval Holder to revise, amend and/or resubmit the proposed monitoring plan; and
 - 22.2 implemented within 10 Business Days, unless otherwise agreed, of receiving written approval of the monitoring plan from the Administering Agency.
23. Any proposed revisions of the monitoring plan must be:
 - 23.1 submitted to the Administering Agency for review; and
 - 23.2 approved by the Administering Agency prior to implementation noting that the Administering Agency may require the Approval Holder to revise, amend and/or resubmit the proposed revision.

Reporting

24. The Approval Holder must as soon as practicable, and in any case within 24 hours, after first becoming aware notify the Administering Agency of non-compliances, that are not trivial or negligible, with this Approval.
25. Records must be kept of all non-compliances, including those assessed as trivial or negligible, with this Approval.
26. The Approval Holder must comply with the requirements of section 14 of the *Waste Management and Pollution Control Act*.
27. The Approval Holder must immediately and in any case within 24 hours notify the Administering Agency of any potential or actual environmental harm or pollution by contacting the Pollution Hotline on telephone number 1800 064 567 and emailing pollution@nt.gov.au.
28. The Approval Holder must complete the Annual Audit and Compliance Report (AACR), Appendix 1, and provide to the Administering Agency within two calendar months of the anniversary of the commencement date of this Approval for each year of the Approval unless otherwise agreed.

ENVIRONMENT PROTECTION APPROVAL (EPA7-3)

29. The Approval Holder must submit a monitoring report to the Administering Agency within two calendar months of the anniversary of the commencement date of this Approval for each year of the Approval unless otherwise agreed.

The monitoring report must:

- 29.1 include but is not limited to a trend analysis and interpretation of analytical data collected as a condition of this Approval; and
29.2 be made available on the Approval Holder's Australian website.

END OF APPROVAL CONDITIONS

This Approval is not valid unless signed below:

William Freeland

Chairperson

Delegate for the NT EPA



Dated the 29 / 8 / 2014

ENVIRONMENT PROTECTION APPROVAL (EPA7-3)

DEFINITIONS

All terms used in this Approval which are defined in the *Waste Management and Pollution Control Act* have the meaning given in that Act unless otherwise or further defined in this section

'Act'	means the <i>Waste Management and Pollution Control Act</i> of the Northern Territory
'Activity'	means the activity approved under this Approval described as the Approved activity on page 2 of this Approval. This definition does not in any way limit the meaning of the term given in the Act.
'Administering Agency'	means the Department of Lands, Planning and the Environment, or if dissolved, another Northern Territory Government Department with the responsibility of administering the Act.
'Approval'	means an Approval granted and in force under the Act.
'Business Day'	means a day not Saturday, Sunday or a public holiday.
'Beneficial Use'	means the uses of water specified in subsection (3) of the Water Act.
'Environment audit'	includes but is not limited to the meaning as described in Part 6 of the Act.
'Location'	is the Location of Premises as described on page 1 of this Approval.
'Qualified person'	means a person included on the register established and maintained pursuant to section 68 of the Act.
'Records'	any written information as requested as a condition of this licence. Any logs, registers or other documents.
'Site of Conservation Significance'	means any site listed at: http://lrm.nt.gov.au/plants-and-animals/conservation-for-land-managers/sites-of-conservation-significance/list

ENVIRONMENT PROTECTION APPROVAL (EPA7-3)

APPENDIX 1 Annual Audit and Compliance Report (AACR)

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ENVIRONMENT PROTECTION APPROVAL

(Pursuant to section 34 of the *Waste Management and Pollution Control Act*)

APPROVAL NO.	EPA7-3
REPORTING PERIOD	

Please email a copy of your completed audit compliance report to pollution@nt.gov.au

1. APPROVAL HOLDER DETAILS

Approval Details

Approval Number: **EPA7-3**
 Commencement Date: 19 April 2012
 Amendment Date(s): 30 October 2012, 28 November 2012, 29 August 2014
 Expiry Date: 19 April 2017.

Approval Holder

Legal Entity Name: Ichthys LNG Pty Ltd
 ABN: 42 150 217 299
 ACN: 150 217 299
 Registered Business Address: Level 22, 100 St Georges Terrace, Perth WA 6000
 Postal Address: Level 22, 100 St Georges Terrace, Perth WA 6000
 Contact Person: Sandy Griffin
 Position Title: Environmental Approvals Coordinator
 Contact Details:
 b/h: (08) 6213 6860
 mobile: 0417 286 356
 email: sandy.griffin@inpex.com.au

Location of Premises

Address: NT Portion 07002, 144 Wickham Point Road, Wickham NT 0822.
 Section 1901 and Section 1896, Hundred of Ayers, Wickham NT 0822.
 1000 Channel Island Rd, Wickham NT, 0822.

24 hour emergency response

Contact Person: Duty Manager
 Telephone Numbers: 0418 237 232

Approved Activity

Constructing, installing and carrying out works in relation to premises for processing hydrocarbons so as to produce, store and despatch liquefied

ENVIRONMENT PROTECTION APPROVAL (EPA7-3)

natural gas or methanol pursuant to Schedule 2, Part 1 (3) of the Act.

Being the activity particularly described in INPEX, Ichthys Project, Ichthys Onshore LNG Facilities Construction Environmental Management Plan (Company document L290-AH-PLN-0059) as revised (subject to approval by the Administering Agency as provided for in this Approval).

ENVIRONMENT PROTECTION APPROVAL

(Pursuant to section 34 of the *Waste Management and Pollution Control Act*)

2. COMPLIANCE WITH APPROVAL CONDITIONS

	ACTION	How	EVIDENCE	WHEN	STATUS
	APPROVAL CONDITIONS				
	Administrative				
1.	The Approval Holder must notify the Administering Agency within 24 hours if there are changes to the details of the 24 hour emergency contact as provided on page one of this Approval.				
2.	The Approval Holder must notify the Administering Agency within 14 days if there are changes to the Approval Holder details as provided on page one of this Approval.				
3.	The Approval Holder must cause clear and legible signage to be displayed in a prominent location at the primary road entrance to the Location including the following details: 3.1. Environment Protection Approval number issued under the <i>Waste Management and Pollution Control Act</i> ; and 3.2. The 24 hour emergency contact details as provided on page one of this Approval or as amended in accordance with this Approval.				
4.	The Approval Holder must cause a copy of this Approval to be available at all times: 4.1. on the Approval Holder's Australian website; and 4.2. at the Location.				

ENVIRONMENT PROTECTION APPROVAL (EPA7-3)

	ACTION	HOW	EVIDENCE	WHEN	STATUS
5.	Where this Approval requires the provision of any notice, document or other correspondence to the Administering Agency, the relevant contact is: Pollution Control Physical Address: Level 2 Darwin Plaza, 41 Smith Street Mall, Darwin NT 0800 Postal Address: GPO Box 3675, DARWIN NT 0801 Email: pollution@nt.gov.au				
6.	All notices, documents or other correspondence required to be provided pursuant to this Approval must be provided in electronic form unless otherwise specified as a condition of this Approval.				
	Operational				
7.	The Approval Holder must at a minimum: 7.1. implement and comply with: INPEX, Ichthys Project, Ichthys Onshore LNG Facilities Construction Environmental Management Plan (Company document number L290-AH-PLN-0059) (CEMP), as revised and approved by the NT EPA; 7.2. comply with all applicable laws; and 7.3. comply with all permits and approvals issued in relation to the Activity.				

ENVIRONMENT PROTECTION APPROVAL (EPA7-3)

	ACTION	HOW	EVIDENCE	WHEN	STATUS
8.	The Approval Holder must, without limiting any other condition of this Approval, in conducting the Activity, do all things reasonable and practicable to ensure the Activity does not adversely affect the Declared Beneficial Uses and Objectives as declared from time to time, including those applying to: 8.1. the Elizabeth-Howard Rivers Region Groundwater; and 8.2. the Darwin Harbour Region.				
9.	The Approval Holder must cause a copy of the current CEMP to be: 9.1. available on the Approval Holder's Australian website; and 9.2. provided to the Administering Agency.				
10.	The Approval Holder must: 10.1 Submit all revisions of the CEMP to the Administering Agency for approval, other than minor revisions involving changes such as typographical changes or revisions to formatting and referencing to other documents; and 10.2 Submit a revised copy of the CEMP to the Administering Agency for information, when the revision has incorporated only minor changes, such as typographical or formatting changes or referencing to other documents.				
11.	The CEMP must be revised and approved by the Administering Agency prior to commencing any works that are not addressed in an approved CEMP and will or may cause or increase the potential for environmental harm, such as by any increase of emissions or discharges.				

ENVIRONMENT PROTECTION APPROVAL (EPA7-3)

	ACTION	How	EVIDENCE	WHEN	STATUS
12.	Each revision of the CEMP must: 12.1 Address all works that will be conducted prior to approval of the next revision of the CEMP; 12.2 Be reviewed and endorsed by a qualified person as meeting the requirements of the <i>Waste Management and Pollution Control Act</i>, prior to submission to the Administering Agency; and 12.3 Be submitted to the Administering Agency for review (with a copy of the qualified person's certified review), at least 30 business days prior to implementation, noting the Administering Agency may require the Approval Holder to revise, amend and resubmit the CEMP.				
13.	The Approval Holder must maintain and operate a 24 hour community telephone contact number and must ensure that the telephone number is provided: 13.1 in a prominent location on the Approval Holder's Australian website; and 13.2 in other publicly available documents relating to the Activity.				
14.	The Approval Holder must maintain a log of all complaints made, in relation to the Activity, to any persons involved in the Activity. The log must include details of the following: • the date and time of the complaint; • the contact details of the complainant if known, or where no details are provided a note to that effect; • the nature of the complaint; • the nature of events giving rise to the complaint; • prevailing weather conditions at the time of the complaint; • the action taken in relation to the complaint, including any investigation or follow-up contact with the complainant; and • if no action was taken, why no action was taken. The log must be retained for the duration of this Approval.				

ENVIRONMENT PROTECTION APPROVAL (EPA7-3)

	ACTION	HOW	EVIDENCE	WHEN	STATUS
15.	The Approval Holder must maintain a log of events causing or threatening to cause pollution including, but not limited to, fires, accidental spillages and discharges to Darwin Harbour.				
16.	The Approval Holder must segregate waste for recycling, reuse or disposal.				
17.	The Approval Holder must keep records of listed waste in accordance with Regulation 11 of the <i>Waste Management and Pollution Control (Administration) Regulations</i> .				
	Environmental Audit(s)				
18.	An annual environmental audit must be undertaken by a qualified person to evaluate compliance with: • this Approval; • the <i>Waste Management and Pollution Control Act</i>; and • the <i>Water Act</i>.				
19.	The proposed scope for the environmental audit must be submitted, no later than 20 Business days prior to the proposed commencement date of the environmental audit (which must be specified when the proposed scope is submitted), to the Administering Agency for review and approval.				
20.	The environmental audit must not commence until written approval is received from the Administering Agency noting that the Administering Agency may require the Approval Holder to revise, amend or resubmit the proposed scope.				

ENVIRONMENT PROTECTION APPROVAL (EPA7-3)

	ACTION	HOW	EVIDENCE	WHEN	STATUS
21.	The environmental audit report must be: 21.1 completed within two calendar months of receipt of approval from the Administering Agency unless otherwise agreed; 21.2 signed by the qualified person conducting the audit; and 21.3 provided in full to the Administering Agency within five Business Days of being signed by the qualified person conducting the audit.				
	Monitoring				
22.	The Approval Holder must submit a monitoring plan to assess environmental impacts of the Activity to the Administering Agency by 1 June 2012. The monitoring plan must be: 22.1 approved by the Administering Agency, noting that the Administering Agency may require the Approval Holder to revise, amend and/or resubmit the proposed monitoring plan; and 22.2 implemented within 10 Business Days, unless otherwise agreed, of receiving written approval of the monitoring plan from the Administering Agency.				
23.	Any proposed revisions of the monitoring plan must be: 23.1 submitted to the Administering Agency for review; and 23.2 approved by the Administering Agency prior to implementation noting that the Administering Agency may require the Approval Holder to revise, amend and/or resubmit the proposed revision.				

ENVIRONMENT PROTECTION APPROVAL (EPA7-3)

	ACTION	HOW	EVIDENCE	WHEN	STATUS
	Reporting				
24.	The Approval Holder must as soon as practicable, and in any case within 24 hours, after first becoming aware notify the Administering Agency of non-compliances, that are not trivial or negligible, with this Approval.				
25.	Records must be kept of all non-compliances, including those assessed as trivial or negligible, with this Approval.				
26.	The Approval Holder must comply with the requirements of section 14 of the <i>Waste Management and Pollution Control Act</i> .				
27.	The Approval Holder must immediately and in any case within 24 hours notify the Administering Agency of any potential or actual environmental harm or pollution by contacting the Pollution Hotline on telephone number 1800 064 567 and emailing pollution@nt.gov.au .				
28.	The Approval Holder must complete the Annual Audit and Compliance Report (AACR), Appendix 1, and provide to the Administering Agency within two calendar months of the anniversary of the commencement date of this Approval for each year of the Approval unless otherwise agreed.				
29.	The Approval Holder must submit a monitoring report to the Administering Agency within two calendar months of the anniversary of the commencement date of this Approval for each year of the Approval unless otherwise agreed. The monitoring report must: 29.1 include but is not limited to a trend analysis and interpretation of analytical data collected as a condition of this Approval; and 29.2 be made available on the Approval Holder's Australian website.				

Annex B

INPEX Terms Of Reference And NT EPA Approval

Our ref: EN2011/0234-03~0172
Your ref: C075-IPX-NRY-LE-00215 & L075-AH-TOR-10003

Ms Sandy Griffin
Environmental Approvals Coordinator
Ichthys LNG Pty Ltd
Level 22 100 St Georges Terrace
Perth WA 6000

Dear Ms Griffin

APPROVAL OF SCOPE FOR ENVIRONMENTAL AUDIT– EPA7-3

The Northern Territory Environment Protection Authority (NT EPA) has received the scope for the environmental audit in accordance with conditions 18 and 19 of environment protection approval EPA7-3.

I approve the audit scope as it was provided and request that the auditor be advised to particularly examine the waste water discharge and waste management procedures, including the re-use and disposal of spent hydrotesting waste water.

If you have any questions please contact Jane Orr on 08 8924 4218 or email pollution@nt.gov.au.

Yours sincerely



William John Freeland

Chairman

Delegate for the Northern Territory Environment Protection Authority

✓ April 2016

C075-IPX-NRY-LE-00215

26 February 2016

Jane Orr
Senior Environmental Officer
Pollution Control
Northern Territory Environment Protection Authority (NT EPA)
GPO Box 3675
Darwin NT 0801

Dear Jane

SUBMISSION OF AUDIT SCOPE IN ACCORDANCE WITH ENVIRONMENT PROTECTION APPROVAL FOR ICHTHYS LNG DEVELOPMENT PROJECT (EPA7-3) CONDITION 19

In accordance with Condition 19 of Environment Protection Approval 7-3 (EPA7-3), please find attached Audit Scope #4 for Onshore works at Bladin Point, for review and approval by the Northern Territory Environment Protection Authority (NT EPA).

As per Condition 18 of EPA7-3, an audit by a qualified person is required to be conducted annually to evaluate compliance with EPA7-3, the *Waste Management and Pollution Control Act* and the *Water Act*. The audit scope is to be provided to the NT EPA no later than 20 business days prior to the proposed commencement date, which is scheduled to commence 18 April 2016. The audit will cover the period May 2015 to April 2016.

We note that as per Condition 20, the environmental audit must not commence until written approval is received from the NT EPA.

Should you require any clarification on dates or the proposed audit scope, please contact or the undersigned or Pippa Manning (Lead Environmental Advisor) on pippa.manning@inpex.com.au or (08) 8924 3261.

We look forward to your response with regards this audit scope.

Yours sincerely,



Sandy Griffin
Environmental Approvals Coordinator

Attach: Audit Scope for Environment Protection Approval EPA7-3 (L075-AH-TOR-10003)

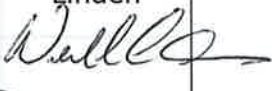
Attachment A: Audit Scope for Environmental Protection Approval EPA7-3



AUDIT SCOPE FOR ENVIRONMENTAL PROTECTION APPROVAL EPA7-3

Terms of Reference

Document No.: L075-AH-TOR-10003
Security Classification: Confidential

Rev	Date	Description	Prepared	Checked	Line Manager endorsed	Director / GM approved
0		Issued for approval	J. van Rensburg 	P. Manning 	B. Anderson 	C. van der Linden 

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Table of contents

1	INTRODUCTION	1
1.1	Background	1
1.2	Objectives	1
1.3	Audit detail	1
1.3.1	Audit methodology	1
1.3.2	Audit timeframe and reporting	2
1.3.3	Proposed audit locations	3
1.3.4	Proposed auditor and auditees	3
1.3.5	Reference documents	4
1.4	Focus areas of the audit	4
1.5	Audit limitations	5
2	AUDIT SCOPE	6

List of tables

Table 2-1	EPA7-3 Conditions – Audit Criteria	7
Table 2-2	Company Environmental Commitments Register – Onshore and Nearshore Facilities (L075-AH-LIS-0001)	11

Table of appendices

APPENDIX A:	Curriculum Vitae of Qualified Auditor	25
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1 INTRODUCTION

1.1 Background

In accordance with Environment Protection Approval 7-3¹ (EPA7-3), the approval holder must arrange for an annual environmental audit to be undertaken by a qualified person to evaluate compliance with the approval conditions of EPA7 and with relevant provisions of the Northern Territory (NT) *Waste Management and Pollution Control Act* (WMPC Act) and the NT *Water Act*.

The scope and proposed commencement date for the audit must be approved by the Northern Territory Environment Protection Authority (NT EPA) prior to the commencement of the audit.

Environmental inspections and auditing will be undertaken to comprehensively assess the nature and extent of environmental compliance with set procedures, guidelines, management plans and environmental frameworks related to the EPA7-3 approval conditions. The audit will check for accountability and seek documented evidence of compliance, identify opportunities to further improve environmental compliance, and prioritise any necessary actions identified during the course of the audit to ensure environmental compliance is maintained moving forward.

1.2 Objectives

The key objectives of the environmental audit include:

- evaluation of environmental compliance with the conditions of EPA7-3 over the period May 2015 to April 2016 inclusive;
- evaluation of environmental compliance with specific commitments made in the JKC Australia LNG Pty Ltd ("Contractor") Ichthys Onshore LNG Facilities Construction Environmental Management Plan (CEMP) [L290-AH-PLN-0059], revisions 12 (valid from May 2015 to December 2015) and 17 (valid from December 2015 to April 2016);
- evaluation of compliance with the relevant provisions of the WMPC Act and the *Water Act*.

1.3 Audit detail

1.3.1 Audit methodology

The audit will be planned in accordance with INPEX Operations Australia Pty Ltd ("Company") Auditing Procedure [C075-AQ-PRC-0001].

The proposed audit scope will be provided to the NT EPA for review and approval no later than 20 business days prior to the proposed commencement date of the audit. The audit will commence after written approval has been received by Company from the NT EPA.

The lead auditor will confirm the following details with the relevant Company representative(s) prior to the audit to establish:

¹ EPA7 was issued to INPEX by NRETAS on 19 April 2012. EPA7 was reissued as EPA7-1 on 10 October 2012, after minor amendments to the emergency contact details and NT government departmental changes. EPA-2 was issued on 28 November 2012, upon amendment of approval holder and contact details. EPA7-3 was issued on 29 August 2014 upon amendments to a number of the approval conditions.

- availability of key personnel (including Contractor's personnel) to be involved in the audit, and
- availability of responsible managers to attend opening and closing meetings.

An Opening Meeting will be undertaken to discuss the audit purpose, scope, expectations, methodology and timetable.

The pre-prepared checklist, based on EPA7-3 Approval Conditions and Company Environmental Commitment and Conditions (Appendices 1 and 2 respectively, cited here as Tables 2-1 and 2-2) will be used as a basis to evaluate compliance. Evidence of compliance will be sought by interviewing key personnel, recording physical field observations and examining documents, data and records (where applicable) to verify compliance. Any objective evidence that demonstrates conformance or non-conformance with specific conditions or commitments is to be recorded against the applicable criterion on the checklist.

Observations will be recorded using the audit checklist as presented in Tables 2-1 and 2-2, with findings categorised in accordance with the INPEX Auditing Procedure, as follows.

A	Acceptable, no action required
O	Observations noted, response required with proposed action and timing within agreed timeframes
N	Non-conformance requiring corrective action within agreed timeframes.
C	Critical non-conformance requiring immediate corrective action
N/A	Not applicable

The audit checklist shall be used to document findings resulting from the audit. Upon completion of the audit, but prior to the audit Closing Meeting, the audit team shall meet to evaluate the objective evidence reviewed during the audit and to discuss any potential observations and non-conformances. This process is to assess the validity of the audit findings and to agree that the findings accurately represent the situation observed at the time of the audit.

The Audit Team Leader shall convene a Closing Meeting with representatives of Company and Contractor to finalise the audit findings. Following the completion of the audit, the Audit Team Leader shall prepare the formal Audit Report using the completed audit checklists within an agreed timeframe.

Any non-conformance(s) identified by the auditor will be reviewed by INPEX and Contractor (depending on the owner of the non-conformance) before incorporation into the final Audit Report. Comments shall be provided to the qualified auditor within an agreed timeframe following conclusion of the audit.

Any non-conformance(s) identified by the auditor during the 2015 EPA7-3 audit will be incorporated into the 2016 EPA7-3 audit scope for review and verification of corrective actions implemented. Each non-conformance(s) or observation(s) will be tracked and recorded via an action tracking register and closed out prior to the next audit, where practicable.

1.3.2 Audit timeframe and reporting

In accordance with EPA7-3 Approval Conditions, the following timeframes will be met:

1. Condition 19: The proposed scope for the environmental audit must be submitted, no later than 20 business days prior to the proposed commencement date of the environmental audit (which must be specified when the proposed scope is submitted), to the Administering Agency for review and approval;
2. Condition 20: The environmental audit must not commence until written approval is received from the Administering Agency, noting that the Administering Agency may require the Approval Holder to revise, amend or resubmit the proposed scope.
3. Condition 21: The environmental audit report must be:
 - 21.1) completed within two calendar months of receipt of approval from the Administering Agency unless otherwise agreed,
 - 21.2) signed by the qualified person conducting the audit; and
 - 21.3) provided in full to the Administering Agency within five business days of being signed by the qualified person conducting the audit.
4. Condition 28: The Approval Holder must complete the Annual Audit and Compliance Report (AACR), Appendix 1, and provide to the Administering Agency within two calendar months of the anniversary of the commencement date of this Approval for each year of the Approval unless otherwise agreed.

The commencement date of the EPA was on 19 April 2012 and subsequently the AACR must be submitted by 19 June 2015. The audit is scheduled to be undertaken from 18 to 23 April 2016, allowing 6 days for auditing the proposed scope, including site inspection(s) for compliance verification of field activities.

1.3.3 Proposed audit locations

The audit will be conducted at Contractor's site offices located at Bladin Point.

1.3.4 Proposed auditor and auditees

In accordance with EPA7-3 Approval Condition 18, the audit will be undertaken by a 'qualified person' (a person included on the register established and maintained pursuant to Section 68 of the WMPC Act). The qualified person is appointed as an approved auditor in the Northern Territory, Victoria or New South Wales. Company has provided the credentials of the proposed auditor to this Terms of Reference in Appendix A.

Company and Contractor personnel will be present as auditees, including:

- Bruce Anderson, Company Onshore HSE Manager
- Pippa Manning, Company Lead Site Environmental Advisor
- Jacques van Rensburg, Company Senior Environmental Advisor
- Suzanne Mayne, Contractor Environmental Manager
- Ernest Yap, Contractor Lead Environmental Engineer
- Katerina Korbelova, Associate Environmental Advisor

1.3.5 Reference documents

The following documents will be used as reference:

- EPA7-3
- Approved Onshore Project CEMP (L290-AH-PLN-0059), Revisions 12 and 17
- 2015 Annual Audit and Compliance Report
- 2015 Qualified Person Environmental Compliance Report (L290-AH-REP-10707)
- Environmental Commitments Register - Onshore and Nearshore Facilities (L075-AH-LIS-0001)
- Company and Contractor environmental compliance audit reports
- *Water Act* and *WMPC Act*

Contractor environmental management documents that are specifically referenced in the Onshore Project CEMP will be provided to the Auditor during the audit upon request, to demonstrate that the Contractor has a system for effectively implementing the requirements of the CEMP. It should be noted that Contractor has engaged a number of subcontractors to assist in the execution of the construction scope and activities. As such, some of the documentation, especially those applicable to day-to-day environmental management activities, may still be held by the relevant subcontractor(s). Company and Contractor are collating documents relevant to this audit scope for the Auditor's consideration, assessment and compliance verification.

1.4 Focus areas of the audit

The focus of the audit is to verify compliance against the EPA7-3 Approval Conditions and the CEMP commitments and conditions. While evidence of Contractor environmental management documentation can be shown to provide context to the Auditor that Project CEMP commitments and approval conditions are embedded within the Contractor's Environmental Management System, the scope of the audit is to ensure that EPA7-3 approval conditions and commitments made by Company are being implemented and obligations fulfilled. Unless there are specific Contractor documents that are referenced within the CEMP or in the approval conditions, then Contractor level documentation is for context only.

The format of the 2013 to 2015 audit scopes has been used for the 2016 audit scope and can be updated (where necessary) to include relevant activities at the time of future audits. Any subsequent audit(s) will be prepared and submitted to the Administering Agency within the conditioned timeframes prescribed in EPA7 (as amended), or as agreed with the NT EPA.

Opportunities identified during this audit, which may lead to improvements in future audit scopes, will be incorporated into future audits in order to achieve continuous improvement.

1.5 Audit limitations

All documentation relevant to the audit will be provided to the Auditor for review, as requested. However, Contractor documentation will be provided onsite. Company is not in a position to release all Contractor documents to external parties for review off-site, which are considered to be commercial in confidence and/or the intellectual property of the Contractor. However, the majority of documentation relevant to the EPA7-3 audit scope does not fall within this category.

2 AUDIT SCOPE

The scope of work for the environmental audit will focus on current and active construction activities of the onshore LNG facilities and its associated infrastructure.

This includes compliance with the following:

- EPA7-3 Approval Conditions (Table 2-1)
- WMPC Act
- *Water Act*
- Contractor's Ichthys Onshore LNG Facilities Construction Environmental Management Plan (CEMP) (L290-AH-PLN-0059 [revisions 12 and 17])
- Contractor's Environmental Impact Monitoring Program (L290-AH-PLN-10016)
- Contractor's Erosion and Sediment Control Plan (L290-AH-PLN-10204);
- Company Environmental Commitments and Conditions (Table 2-2), as included in the Project CEMP.

In order to evaluate compliance, the following documents are examples of the types of evidence that will be made available for review, where applicable. This list is not exhaustive and other documents may be provided for substantiation:

- Company and Contractor environmental compliance audit reports
- Contractor environmental management procedures
- Contractor work method statements
- Contractor environmental inspection checklist
- Contractor waste tracking records and receipts
- Company and Contractor daily, weekly and/or monthly reports
- Contractor toolbox talks and pre-start records
- Company and Contractor action tracking register(s)
- Company and Contractor meeting minutes.

In addition to the documents detailed above, key Company and Contractor personnel will be available for interview. These include but are not limited to the following:

- Project manager(s)
- Site supervisor(s)
- Project engineer(s)
- Environmental engineer(s) and advisor(s)
- HSE advisor(s).

Table 2-1 EPA7-3 Conditions – Audit Criteria

Condition No #	Areas for Audit – EPA7-3 Conditions	Comments / Compliance Evidence	A/O/N/C N/A	Findings	When (Date)
Administrative					
1.	The Approval Holder must notify the Administering Agency within 24 hours if there are changes to the details of the 24 hour emergency contact as provided on page one of this Approval.				
2.	The Approval Holder must notify the Administering Agency within 14 days if there are changes to the Approval Holder details as provided on page one of this Approval.				
3.	The Approval Holder must cause clear and legible signage to be displayed in a prominent location at the primary road entrance to the Location including the following details: 3.1. Environment Protection Approval number issued under the Waste Management and Pollution Control Act; and 3.2. The 24 hour emergency contact details as provided on page one of this Approval or as amended in accordance with this Approval.				
4.	The Approval Holder must cause a copy of this Approval to be available at all times: 4.1. on the Approval Holder's Australian website; and 4.2. at the Location.				
Operational					
7.	The Approval Holder must at a minimum: 7.1 implement and comply with: • INPEX, Ichthys Project, Ichthys Onshore LNG Facilities Construction Environmental Management Plan (Company document number L290-AH-PLN-0059) (CEMP), as revised and approved by the NT EPA; 7.2 comply with all applicable laws; and 7.3. comply with all permits and approvals issued in relation to the Activity.	Specific focus areas of commitments made in the CEMP will be identified by the auditor. Refer to Table 2-2 for the breakdown of specific criteria to be audited, in order to measure compliance with applicable laws, permits and approvals.			
8.	The Approval Holder must, without limiting any other condition of this Approval, in conducting the Activity, do all things reasonable and practicable to ensure the Activity does not adversely affect the Declared Beneficial Uses and Objectives as declared from time to time, including those applying to: 8.1. the Elizabeth-Howard Rivers Region Groundwater; and 8.2. the Darwin Harbour Region.				
9.	The Approval Holder must cause a copy of the current CEMP to be: 9.1. available on the Approval Holder's Australian website; and 9.2. provided to the Administering Agency.				

Condition No #	Areas for Audit – EPA7-3 Conditions	Comments / Compliance Evidence	A / O / N / C N / A	Findings	When (Date)
10.	The Approval Holder must: 10.1. Submit all revisions of the CEMP to the Administering Agency for approval, other than minor revisions involving changes such as typographical changes or revisions to formatting and referencing to other documents; and 10.2. Submit a revised copy of the CEMP to the Administering Agency for information, when the revision has incorporated only minor changes, such as typographical changes or formatting changes or referencing to other documents.				
11.	The CEMP must be revised and approved by the Administering Agency prior to commencing any works that are not addressed in an approved CEMP and will or may cause or increase the potential for environmental harm, such as by any increase of emissions or discharges.				
12.	Each revision of the CEMP must: 12.1 Address all works that will be conducted prior to approval of the next revision of the CEMP 12.2 Be reviewed and endorsed by a qualified person as meeting the requirements of the Waste Management and Pollution Control Act, prior to submission to the Administering Agency; and 12.3 Be submitted to the Administering Agency for review (with a copy of the qualified person's certified review), at least 30 business days prior to implementation, noting the Administering Agency may require the Approval Holder to revise, amend and resubmit the CEMP.				
13.	The Approval Holder must maintain and operate a 24 hour community telephone contact number and must ensure that the telephone number is provided: 13.1 in a prominent location on the Approval Holder's Australian website; and 13.2 in other publically available documents relating to the Activity.				
14.	The Approval Holder must maintain a log of all complaints made, in relation to the Activity, to any person involved in the Activity. The log must include details of the following: - the date and time of the complaint; - the contact details of the complainant if known, or where no details are provided a note to that effect; - the nature of the complaint; - the nature of events giving rise to the complaint; - prevailing weather conditions at the time of the complaint; - the action taken in relation to the complaint, including any investigation or follow-up contact with the complainant; and - if no action was taken, why no action was taken. The log must be maintained for the duration of this Approval.				
15.	The Approval Holder must maintain a log of events causing or threatening to cause pollution including, but not limited to, fires, accidental spillages and discharges to Darwin Harbour.				
16.	The Approval Holder must segregate wastes for recycling, reuse or disposal.				

Condition No #	Areas for Audit – EPA7-3 Conditions	Comments / Compliance Evidence	A / O / N / C N / A	Findings	When (Date)
17.	The Approval Holder must keep records of listed waste in accordance with Regulation 11 of the Waste Management and Pollution Control (Administration) Regulations.				
Environmental Audit(s)					
18.	An annual environmental audit must be undertaken by a qualified person to evaluate compliance with: • this Approval; • the Waste Management and Pollution Control Act; and • the Water Act.				
19.	The proposed scope for the environmental audit must be submitted, no later than 20 Business days prior to the proposed commencement date of the environmental audit (which must be specified when the proposed scope is submitted), to the Administrating Agency for review and approval.				
20.	The environmental audit must not commence until written approval is received from the Administrating Agency noting that the Administrating Agency may require the Approval Holder to revise, amend or resubmit the proposed scope.				
21.	The environmental audit report must be: 21.1 completed within two calendar months of receipt of approval from the Administrating Agency unless otherwise agreed; 21.2 signed by the qualified person conducting the audit; and 21.3 provided in full to the Administrating Agency within five Business Days of being signed by the qualified person conducting the audit.				
Monitoring					
22.	The Approval Holder must submit a monitoring plan to assess environmental impacts of the Activity to the Administrating Agency by 1 June 2012. The monitoring plan must be: 22.1 approved by the Administrating Agency, noting that the Administrating Agency may require the Approval Holder to revise, amend and/or resubmit the proposed monitoring plan; and 22.2 implemented within 10 Business Days, unless otherwise agreed, of receiving written approval of the monitoring plan from the Administrating Agency.				
23.	Any proposed revisions of the monitoring plan must be: 23.1 be submitted to the Administrating Agency for review; and 23.2 approved the Administrating Agency prior to implementation noting that the Administrating Agency may require the Approval Holder to revise, amend and/or resubmit the proposed revision.				

Condition No #	Areas for Audit – EPA7-3 Conditions	Comments / Compliance Evidence	A / O / N / C N / A	Findings	When (Date)
Reporting					
24.	The Approval Holder must as soon as practicable, and in any case within 24 hours, after first becoming aware notify the Administrating Agency of non-compliances, that are not trivial or negligible, with this Approval.				
25.	Records must be kept of all non-compliances, including those assessed as trivial or negligible, with this Approval.				
26.	The Approval Holder must comply with the requirements of section 14 of the Waste Management and Pollution Control Act.				
27.	The Approval Holder must immediately and in any case within 24 hours notify the Administrating Agency of any potential or actual environmental harm or pollution by contacting the Pollution Hotline on telephone number 1800 064 567 and emailing pollution@nt.gov.au .				
28.	The Approval Holder must complete the Annual Audit and Compliance Report (AACR), Appendix 1, and provide to the Administrating Agency within two calendar months of the anniversary of the commencement date of this Approval for each year of the Approval unless otherwise agreed.				
29.	The Approval Holder must submit a monitoring report to the Administrating Agency within two calendar months of the anniversary of the commencement date of this Approval for each year of the Approval unless otherwise agreed. The monitoring report must: 29.1 include but is not limited to a trend analysis and interpretation of analytical data collected as a condition of this Approval; and 29.2 be made available on the Approval Holder's Australian website.				

Table 2-2 Company Environmental Commitments Register – Onshore and Nearshore Facilities (L075-AH-LIS-0001)

ID No.	Environmental commitment / condition	Comments / Compliance Evidence	A / O / N / C N / A	Findings	When (Date)
1	General				
1.01	The Ichthys Project's Health, Safety and Environmental Management Process will align with the requirements of AS/NZS ISO 14001:2004, Environmental management systems—Requirements with guidance for use and AS/NZS 4801:2001 Occupational health and safety management systems - Specification with guidance for use.				
1.02	Management plan will be publicly available at an appropriate time prior to execution.				
2	Receiving Environment Monitoring				
2.01	Wastewater discharge monitoring will be undertaken in the nearshore environment to confirm modelling predictions for wastewater dispersion.				
2.02	Darwin Harbour water-quality monitoring program will be developed and implemented to determine if Project wastewater discharges are adversely impacting on water quality in the Harbour.				
2.03	A marine sediments and bio-indicators monitoring program will be developed to determine if construction activities undertaken in acid sulfate soils have resulted in changes in pH and in the bio-availability of heavy metals in adjacent marine sediments.				
2.10	A groundwater quality monitoring program will be developed to determine if activities in the onshore development area adversely impact on groundwater quality.				
2.13	Airborne noise monitoring will be undertaken to confirm modelling predictions.				
2.14	A marine pests monitoring program will be developed for the nearshore development area. This will be developed in consultation with the relevant agencies.				
2.15	A weed monitoring program will be developed to monitor the distribution and abundance of listed weeds species in the onshore development area.				
2.16	A vegetation rehabilitation monitoring program will be developed and periodic surveys of rehabilitated areas will be undertaken to determine the level of success of rehabilitation programs.				
2.17	A mangrove health monitoring program will be developed to assess the potential effects of Project activities on mangrove health. Additional commitment within the EIS Supplement; mangrove monitoring to be undertaken throughout construction and operation and sediment heights throughout construction.				
2.18	INPEX will consider undertaking fish monitoring to detect changes, beyond natural variation, of key fish species, abundance/distribution resulting from Project construction impacts (e.g. noise, dredging, blasting)				
2.20	Marine mammal monitoring will be undertaken to detect changes, beyond natural variation, of key species, abundance/distribution resulting from Project construction impacts (e.g. noise, dredging, blasting). INPEX continuing to assess best-practice methods for the monitoring of marine mammals.				

ID No.	Environmental commitment / condition	Comments / Compliance Evidence	A / O / N / C N / A	Findings	When (Date)
2.22	INPEX is committed to making information collected from research and monitoring activities available to the public including eco-tourism operators.				
3	Alteration of Marine Habitats				
3.03	Antifouling paints used on offshore and nearshore infrastructure will be selected in accordance with regulatory-authority requirements.				
5	Accidental Marine Hydrocarbon Spills				
5.01	The Project oil spill contingency plan (OSCP) will be revised prior to the commencement of construction and will be periodically reviewed (and updated as required) through the life of the Project.				
5.02	As part of its OSCP, INPEX will have the capability to initiate real-time oil-spill fate and trajectory modelling so that any spill can be monitored and responses optimised.				
5.18	Appropriate spill response equipment will be available on the CPF, the FPSO, and the supply and pipelay vessels as well as at the onshore and nearshore facilities. Regular pollution response exercises will be undertaken.				
5.19	Visual monitoring of hoses, couplings and the sea surface will be undertaken during refuelling operations.				
5.20	Radio contact will be maintained between refuelling vessels and the offshore facilities or other vessels when refuelling activities are being undertaken.				
5.22	Dry-break, breakaway couplings or similar technology will be installed and used where practicable during refuelling operations.				
5.26	The jetty structure is being designed according to Australian Standard AS 4997:2005, Guidelines for the design of maritime structures (taking cyclones into account). The jetty loading arms will be designed to allow them to be tied down in the event of a cyclone.				
7	Underwater noise and blast emissions				
7.01	A cetacean management plan and supporting documentation will be developed and their prescriptions will be implemented.				
7.02	A piledriving and blasting management plan and supporting documentation will be produced and their prescriptions will be implemented.				
7.12	Piledriving activities are planned to be undertaken during daylight hours only. Night-time piledriving would only be required if Project construction activities were to fall significantly behind schedule.				
7.13	An observation zone with a radius of 100 m will be designated at the commencement of piledriving activities. This area will need to be confirmed as being clear of cetaceans, dugongs, turtles and crocodiles for 10 minutes prior to the start of operations. EIS Supplement: Changes to the "observation zone" for visual monitoring to 500m for at least 30 minutes.				

ID No.	Environmental commitment / condition	Comments / Compliance Evidence	A / O / N / C N / A	Findings	When (Date)
7.14	Piledriving will commence with a "soft-start" procedure, where activities are gradually scaled up over a 5-minute period. This will provide an opportunity for any sensitive marine fauna to leave the area before being exposed to the full intensity of underwater noise. EIS Supplement: Soft-start not to proceed until animal has moved outside the zone or is not sighted for 30 minutes; visual monitoring will continue during piledriving works and for 10 minutes after stoppage; Piledriving will temporarily cease if marine mammals approach within 100m of the piling operation and will not recommence until animals have been observed to have moved outside the observation zone (500m) or it is not sighted in the observation zone for 30 minutes.				
7.15	A permit to work (or similar) system will be implemented to ensure that areas where blasting and piledriving activities are occurring, or will occur, are clearly identified and that management measures are in place prior to work commencing.				
8	Marine Pests				
8.01	Quarantine management plans and supporting documentation will be developed and their prescriptions will be implemented in accordance with the requirements of the Department of Agriculture, Fisheries and Forestry (DAFF), the Northern Territory's Department of Primary Industry and Fisheries, and the DPC.				
8.02	INPEX will ensure that vessels engaged in Project activities comply with the bio-fouling requirements of the regulatory authorities.				
8.03	Vessels engaged in Project work will be subjected to a bio-fouling risk assessment which may result in hull inspections or cleaning.				
8.04	Relevant Project vessels will be required to maintain satisfactory records of antifouling management, hull-cleaning actions and ballast-water exchange.				
9	Marine Megafauna				
9.01	A cetacean management plan and supporting documentation will be developed and their prescriptions will be implemented. EIS Supplement: The cetacean management plan will be extended to include dugongs. Also key management controls reconfirmed in SEIS: management measures to be employed through the cetacean management plan: Vessel masters to be trained in cetacean interaction procedures; vessels will be operated at "no wash" speed when within 50–150m of a dolphin and will not intentionally approach a dolphin.				
9.02	Procedures for avoiding interactions between cetaceans and vessels or helicopters will be developed and implemented.				
11	Soil Erosion				
11.01	A vegetation clearing, earthworks and rehabilitation management plan and supporting documentation will be produced and their prescriptions will be implemented.				
11.02	A liquid discharges, surface-water runoff and drainage management plan and supporting documentation will be produced and their prescriptions will be implemented.				

ID No.	Environmental commitment / condition	Comments / Compliance Evidence	A / O / N / C N / A	Findings	When (Date)
11.03	Surface-water drains and discharge points throughout the onshore development area will be designed to minimise erosion.				
11.04	Erosion protection infrastructure (e.g. silt fencing, contouring, and sediment ponds) will be installed to ensure that sediment is contained within the onshore development area as far as is practicable.				
11.05	If soil erosion is evident, exposed surfaces at the affected area will be stabilised with mulched vegetation, dust suppressants or slope-stabilisation products.				
11.06	Large-scale vegetation clearing and earthworks will preferentially be undertaken in dry-season conditions. Should clearing and earthworks be required to be undertaken during the wet season, adequate erosion and sedimentation control measures will be implemented to avoid any possible impacts.				
12	Acid Sulfate Soils				
12.01	An acid sulfate soil (ASS) management plan and supporting documentation will be developed and their prescriptions will be implemented.				
12.02	Onshore facilities will be designed to minimise excavation of ASSs.				
12.03	If excavation of ASS is unavoidable, further testing to determine management and disposal options will be undertaken. Disposal options for ASSs include dumping at an offshore disposal ground; treatment of the ASSs with neutralising agents and reuse of the treated ASS as fill material; or treatment of the ASSs with neutralising agents followed by disposal of the treated ASS material off site. EIS Supplement: INPEX is currently investigating ASS management and, as a priority, actual ASS or potential ASS will be managed in situ with disturbance and movement kept to the minimum, or treated with neutralising agents.				
13	Alteration to Surface and Groundwater				
13.01	A liquid discharges, surface water runoff and drainage management plan and supporting documentation will be produced and their prescriptions will be implemented.				
13.02	Culverts will be installed to maintain natural tidal flows underneath the causeway between Blaydin Point and Middle Arm Peninsula.				
13.03	Numerous surface water drains will be constructed around the perimeter of the onshore development area, which, where applicable, will distribute fresh water to mangrove areas.				
13.04	Some areas on Blaydin Point will remain uncleared or unsealed, which will allow for some groundwater recharge by rainfall.				
14	Vegetation Clearance				
14.01	A vegetation clearing, earthworks and rehabilitation management plan and supporting documentation will be produced and their prescriptions will be implemented.				
14.02	Areas to be cleared will be clearly identified prior to work commencing. Clearing boundaries will be marked in the field and on site plans, and a register of clearing activities will be maintained.				

ID No.	Environmental commitment / condition	Comments / Compliance Evidence	A / O / N / C N / A	Findings	When (Date)
14.03	The vegetation-clearing footprint for the onshore development area will be minimised during the design of the onshore facilities, subject to constructability and safety operating requirements. EIS Supplement: Confirmed landtake in SEIS as 413 ha with 362 ha of vegetation take (61 ha Monsoon vine thicket; 82 ha mangroves and 73 ha Melaleuca); Temporarily disturbed areas such as those in the vicinity of the pipeline shore crossing and onshore pipeline route will be reinstated and rehabilitated, as will any areas around the plant that do not need to remain cleared.				
14.04	All disturbances, including personnel and vehicle movement, will be contained within the designated onshore development area to avoid impacts to surrounding vegetation. Some additional clearances may be required around the perimeter of the site to allow for appropriate firebreaks.				
14.05	Temporarily disturbed areas such as those in the vicinity of the pipeline shore crossing and the onshore pipeline corridor, as well as areas around the plant that do not need to remain cleared, will be rehabilitated following the completion of construction activities.				
14.06	Some topsoil will be stockpiled from cleared areas for future use in rehabilitation.				
14.07	Cleared vegetation will be mulched and stockpiled on site boundaries. Where possible, the mulch will be used for both rehabilitation and soil stabilisation to prevent erosion. Cleared vegetation that cannot be reused will be disposed of off-site. No stockpiled vegetation will be burned.				
15	Alteration of Terrestrial Habitats				
15.01	A vegetation clearing, earthworks and rehabilitation management plan and supporting documents will be produced and their prescriptions will be implemented.				
15.02	Major clearing activities will be undertaken in such a manner as to allow animals to move into remaining surrounding vegetation.				
15.03	"High-risk" entrapment areas (e.g. deep trenches or pits) will be constructed with sloping egress ramps to allow trapped animals to escape. Targeted inspections will be undertaken of these areas and any animals which have been unable to escape will be removed and released.				
16	Creation of Breeding Habitat for Biting Insects				
16.01	Natural drainage will be maintained around roads by installing drains and/or culverts, particularly in intertidal areas such as the causeway between Blaydin Point and Middle Arm Peninsula.				
16.02	Surface-water drainage channels throughout the onshore development area will be designed to minimise the creation of breeding habitat for biting insects. Drains will be kept free of vegetation.				
16.03	Regular inspections will be carried out for mosquito larvae in high-risk areas and controls will be implemented as required.				
16.04	Temporary sedimentation systems will be designed to minimise their potential to become breeding habitat for biting insects.				

ID No.	Environmental commitment / condition	Comments / Compliance Evidence	A / O / N / C N / A	Findings	When (Date)
17	Introduced Species				
17.01	Quarantine management plans and supporting documentation will be developed and their prescriptions will be implemented in accordance with AQIS, DoR and DPC requirements.				
17.02	A vegetation clearing, earthworks and rehabilitation management plan and supporting documentation will be produced and their prescriptions will be implemented.				
17.03	Topsoil containing high densities of weed seeds will not be used in rehabilitation.				
17.04	Infestations of listed weeds will be controlled in the onshore development area and along the access road from Wickham Point Road.				
17.05	Machinery used for earthmoving and vegetation-clearing will be cleaned and inspected prior to commencement of work at the onshore development area to identify any attached material that should be removed for quarantine reasons.				
17.06	A temporary washdown area for earthmoving and vegetation clearing vehicles will be built for the construction phase.				
17.07	A temporary dedicated "quarantine-approved premises" (QAP) area will be provided for on Blaydin Point during the construction phase. The QAP will be designed to meet AQIS requirements.				
17.08	Inspections of incoming vessels and modules will be undertaken in accordance with AQIS standards.				
18	Bushfire Prevention				
18.01	A bushfire prevention management plan and supporting documentation will be produced and their prescriptions will be implemented.				
18.02	Firebreaks will be established around Project infrastructure which borders woodlands. Advice will be sought from the Northern Territory's Bushfires Council on firebreak requirements for Blaydin Point.				
18.03	A firefighting capability will be available and strategically located firefighting stations will be established at the onshore Project site.				
18.04	Firefighting equipment will be available on site at all times, along with accessible supplies of water.				
18.05	Grassy vegetation in the onshore development footprint will be controlled to reduce available fuel loads and prevent wildfire. Control methods may include slashing and spraying.				
18.06	Cleared vegetation will be stockpiled in designated areas, away from potential ignition sources.				
18.07	An internal "hot work" permit system will be implemented for cutting, welding and any other work considered to have a high potential to start a fire.				
18.08	Designated smoking areas will be established for all phases of the Project and receptacles for cigarette butts will be provided.				

ID No.	Environmental commitment / condition	Comments / Compliance Evidence	A / O / N / C N / A	Findings	When (Date)
19	Dust Emissions				
19.01	A dust management plan and supporting documentation will be produced and their prescriptions will be implemented.				
19.02	Monitoring of dust generation and the effectiveness of management controls will be regularly undertaken.				
19.03	Dust suppression techniques will be applied where necessary to protect vegetation health, worker health and amenity. This may include spraying from water trucks, irrigation, or stabilisation and revegetation of cleared areas that are no longer needed as soon as practicable during construction.				
19.04	On-site roads required for the operations phase will be sealed during the construction phase.				
19.05	Multiple handling of soil or rock materials will be minimised.				
19.06	Loads in all trucks transporting soil, aggregate or other dust generating materials to and from the onshore development area will be wetted down to reduce dust.				
21	Onshore Spills and Leaks				
21.01	An onshore spill prevention and response management plan and supporting documentation will be produced and their prescriptions will be implemented.				
21.02	Onshore facilities will be designed and constructed in such a way that spills and leaks can be constrained or isolated, particularly in areas where there is an elevated risk of spill.				
21.03	Material safety data sheets (MSDSs) will be available on the facilities to aid in the identification of appropriate spill clean-up and disposal methods.				
21.04	Chemicals and hazardous substances used during all phases of the Project will be selected and managed to minimise the potential adverse environmental impact associated with their transport, transfer, storage, use and disposal.				
21.05	Spill response materials and equipment (including personal protective equipment) will be available during all phases and will contain equipment to combat both chemical and hydrocarbon spills.				
21.06	Personnel who routinely handle hazardous materials or wastes (e.g. refuelling personnel, pump operators, mechanics, and stores personnel) will receive training in handling, transporting and storing hazardous materials or wastes; in reporting and documentation requirements; and in spill clean-up techniques and practices.				
21.07	During construction of the onshore facilities, appropriate temporary containment facilities will be utilised for the storage of chemicals, fuel and hazardous waste until permanent infrastructure is in place.				
22	Waste				
22.01	A waste management plan and supporting documentation will be developed and their prescriptions will be implemented.				
22.02	Waste minimisation will be included in the tendering and contracting process.				

ID No.	Environmental commitment / condition	Comments / Compliance Evidence	A / O / N / C N / A	Findings	When (Date)
22.03	Sufficient space will be provided on the FPSO and CPF and at the onshore facility to allow for the segregation and storage of wastes.				
22.04	Chemicals and hazardous substances used during all phases of the Project will be selected and managed to minimise the potential adverse environmental impact associated with their disposal.				
22.05	During the early construction phase, appropriate temporary containment facilities will be available for storing waste until permanent infrastructure is in place.				
22.06	All solid-waste receptacles (e.g. skips and bins) will have covers and be fit for purpose and in good condition. This will prevent scavenging animals from gaining access to putrescible wastes.				
22.07	All hazardous liquid wastes will be stored over a bund in leak proof sealed containers.				
22.08	Only approved and licensed waste contractors will be engaged for waste disposal.				
22.09	Waste will be stored in the designated waste stations and appropriately segregated into hazardous waste and nonhazardous waste, and, where possible, into recyclable or reusable hazardous waste and recyclable or reusable nonhazardous waste. In the event of the discovery of any unidentified wastes, these will be treated as hazardous waste and stored accordingly.				
22.15	All hazardous and non-hazardous solid wastes generated in the nearshore development area, including food scraps, will be retained on board vessels and transported to onshore facilities for disposal in accordance with the Marine Pollution Act (NT).				
23	Liquid Discharges				
23.01	A liquid discharges, surface water runoff and drainage management plan and supporting documentation will be developed and their prescriptions will be implemented.				
23.04	Hydrotest management plans and supporting documentation will be developed prior to pre-commissioning for approval under the relevant legislation.				
23.05	A chemical selection process will be developed and will include consideration of the potential for ecotoxicity.				
23.11	Construction vessels, supply vessels and the mobile offshore drilling unit (MODU) will adhere to the following prescriptions laid down by the Protection of the Sea (Prevention of Pollution from Ships) Act 1983 (Cwlth) and the Marine Pollution Act (NT): - Sewage will not be discharged within three nautical miles of land. - Only treated sewage (macerated to fragment diameters less than 25 mm) will be discharged between three and twelve nautical miles of land. - Untreated sewage may be discharged beyond 12 nautical miles of land.				

ID No.	Environmental commitment / condition	Comments / Compliance Evidence	A / O / N / C N / A	Findings	When (Date)
23.12	Antifouling paints containing tributyltin compounds (TBTs) will not be used on any Project vessels or equipment in accordance with the prescriptions of the International Maritime Organization's International Convention on the Control of Harmful Anti-fouling Systems on Ships and the Protection of the Sea (Harmful Anti-fouling Systems) Act 2006 (Cwlth).				
23.14	Oil-in-water concentrations from the bilge discharges of construction and supply vessels, including the MODU, will meet the regulatory requirements of <15 mg/L in accordance with Annex I of the International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 relating thereto (MARPOL 73/78) and the Marine Pollution Regulations (NT). EIS Supplement: INPEX will treat produced water to a specification of 30mg/L hydrocarbon; will use an online analyser that will measure dispersed hydrocarbons. INPEX plans to use MPPE technology.				
23.16	The wastewater outfall diffuser will be designed to optimise near-field dispersion of the discharged wastewater.				
23.17	Drainage at the onshore development area will be designed to isolate areas that could be exposed to hydrocarbon contamination. Wastewater from these areas will be directed to an oily-water treatment system.				
23.19	Wastewater streams will be sampled at appropriate frequencies and selected water-quality parameters will be documented.				
23.20	Maintenance practices during the operations phase (e.g. drainage of hydrocarbons from tanks and equipment) will avoid discharge of hydrocarbons to the oily-water treatment system.				
25	Housing, Social Infrastructure and Services				
25.03	A first aid capability will be available at the onshore facility during both the construction and the operation phases.				
25.04	INPEX will work in conjunction with the Northern Territory Police, Fire and Emergency Services in order to plan effectively for any major emergencies.				
25.05	A firefighting capability will be available and strategically located firefighting stations will be established at the onshore Project site.				
25.07	Appropriate quantities of water will be stored and made available for firefighting purposes during both the construction and operations phases at the onshore Project site.				
25.08	An emergency response plan will be developed and emergency response teams will be established at the onshore Project site for both the construction and the operations phases of the Project.				
25.10	Temporary ablution blocks and sewage systems will be in place at the onshore Project site to meet sewage management requirements during the construction phase.				
25.12	Waste-disposal facility capabilities for the construction and operations phases at the onshore Project site will be addressed during the detailed-design phase of the Project; this will be done in consultation with relevant local government authorities.				

ID No.	Environmental commitment / condition	Comments / Compliance Evidence	A / O / N / C N / A	Findings	When (Date)
25.13	Ongoing consultation will be undertaken with local government, the Department of Lands and Planning and Infrastructure (DLP) and the Power and Water Corporation (PWC) in order to plan effectively for the provision of scheme water for Project requirements at the onshore Project site.				
26	Onshore Traffic				
26.01	A traffic management plan and supporting documentation will be produced and their prescriptions will be implemented.				
26.03	Bus transport from the accommodation village or designated pick-up areas will be provided for the majority of the construction personnel.				
26.04	Designated routes for travel from quarries, the accommodation village, the Darwin central business district, airport and East Arm Wharf will be set for the Project. The selection process for the routes will give consideration to minimising disturbance to local traffic and will be communicated to all relevant personnel.				
26.05	Commitment to undertaking additional traffic impact assessment based on revised traffic volumes.				
27	Marine Traffic				
27.04	Shipping traffic schedules during the construction and operations phases will be developed in consultation with the DPC to minimise the impacts of marine traffic on Darwin Harbour.				
27.05	An application will be made to the relevant government and regulatory agencies to implement safety exclusion zones and restricted navigation zones around LNG, LPG and condensate tankers, and around selected construction vessels such as dredging and pipe-lay vessels.				
28	Heritage				
28.01	Heritage management plans and supporting documentation will be developed and their prescriptions will be implemented.				
28.02	A Larrakia Heritage Management Committee (LHMC) will be established. It will be made up of representatives of the Larrakia people and INPEX and will have a standing agenda.				
28.03	Prior to commencement of construction, Aboriginal sites in the onshore development area will be divided into two categories: those which will receive full protection from disturbance and those which may need to be removed. EIS Supplement: INPEX has made alterations to the onshore design to avoid disturbance of known heritage sites within the pipeline corridor and combined operations complex; INPEX has agreed to increase the distance for flagging and fencing of Aboriginal heritage sites to 50m, or to the greatest extent possible where 50m may not be possible.				

ID No.	Environmental commitment / condition	Comments / Compliance Evidence	A / O / N / C N / A	Findings	When (Date)
28.04	In the case of an Aboriginal heritage site which may have to be moved, INPEX will request permission to do so from both the LHMC and the Heritage Branch of the Northern Territory's Department of Natural Resources, Environment, the Arts and Sport (NRETAS). If permission is granted to remove the site, advice will be sought from the traditional custodians on the correct procedures to be adopted for its removal.				
28.05	Where the external boundary of an Aboriginal heritage site is 10 m or closer to any proposed construction activity, flagging, temporary fencing or similar will be erected 5 m from the site boundary and appropriate signage will be put in place if required by the Larrakia people. The boundary demarcation will be removed when the risk of disturbance no longer exists.				
28.06	Daily toolbox meetings, job hazard analyses, permit systems or similar will be implemented on site prior to the commencement of vegetation-clearing or construction activities. These will be undertaken to ensure that work areas are clearly identified before operations commence to avoid accidental disturbance to heritage sites either inside or outside the heritage site boundaries.				
28.07	Anchor management plans will be developed to allow the safe anchoring of vessels undertaking pipe lay, dredging and pile driving activities in the vicinity of any near shore heritage or sacred sites.				
28.08	Monitoring will be undertaken for Aboriginal heritage sites. This will involve inspections by Larrakia representatives prior to and during the construction phase and during the commissioning and operations phases. Photographic records will be maintained for each of the sites.				
28.09	To minimise disturbance, a 100 m-radius controlled zone will be established around all known Catalina flying-boat wrecks.				
28.10	To minimise disturbance, a 100-m-radius controlled zone for the wreck of the SS Ellengowan will apply (based on the intersection of latitude 12°32'16.3"S and longitude 130°52'06.3"E on the Port of Darwin 1:50 000 map sheet AUS 26).				
28.11	To minimise disturbance, a 100-m-radius controlled zone for the wreck of the coal hulk Kelat will apply (based on the intersection of the lines of latitude 12°29'55.4"S and longitude 130°52'40.2"E on the Port of Darwin 1:50 000 map sheet AUS 26).				
28.12	Accurate differential GPS (dGPS) locations of all wrecks near the nearshore development area will be obtained prior to the commencement of construction.				
28.14	During the construction and operations phases, INPEX will periodically assess sediment conditions of Catalina wrecks near to the shipping channel and in consultation with DLPE (formerly NRETAS) determine whether any remedial action is required to address impacts should they arise.				
28.15	The World War II historical sites located on Blaydin Point are not listed and do not require approval to disturb; however INPEX will consult with the Heritage Branch of NRETAS before disturbing the sites, and all sites will be surveyed and recorded.				
28.16	INPEX has made alterations to the onshore design to avoid disturbance of known heritage sites within the pipeline corridor and combined operations complex; INPEX has agreed to increase the distance for flagging and fencing of Aboriginal heritage sites to 50 m, or to the greatest extent possible where 50 m may not be possible.				

ID No.	Environmental commitment / condition	Comments / Compliance Evidence	A / O / N / C N / A	Findings	When (Date)
29	Airborne Noise				
29.01	A piledriving and blasting management plan and supporting documentation will be produced and their prescriptions will be implemented. EIS Supplement: INPEX has committed to using methods other than drilling and blasting for the removal of Walker Shoal. Fall back option maintained within the environmental assessment and subsequent approval for the Project for drill and blast methods to be employed for approximately 4 weeks.				
29.02	Blasting operations will only be undertaken during daylight hours and adequate notice will be provided to communities which could be affected by the sound or activities (e.g. Darwin Harbour users, the City of Palmerston and the Darwin Liquefied Natural gas plant at Wickham Point).				
29.03	Smaller staggered blasts will be used for onshore blasting to minimise ground vibration and noise levels				
29.04	Piledriving activities are planned to be undertaken during daylight hours only. Night-time piledriving would only be required if Project construction activities were to fall significantly behind schedule.				
29.05	Buses will be utilised for transporting the majority of workers to and from site to reduce the total number of vehicles on the roads and therefore noise emissions.				
30	Visual Amenity				
30.04	Dust suppression techniques will be employed where necessary to protect vegetation health, worker health and amenity. This may include spraying from water trucks or irrigation; it may also include stabilisation and revegetation of cleared areas that are no longer needed as soon as practicable during the construction phase.				
32	Public Safety				
32.02	Notice will be given to the Northern Territory's Department of Lands and Planning and the Darwin Port Corporation advising vessel operators of any change to marine traffic conditions because of marine blasting activities.				
32.03	Blasting operations will only be undertaken during daylight hours and adequate notice will be provided to communities which could be affected by the sound or activities (e.g. Darwin Harbour users, the City of Palmerston, and the Darwin Liquefied Natural Gas plant at Wickham Point).				
32.04	Public access to the onshore development area will be restricted during construction.				
32.05	Smaller staggered blasts will be carried out to minimise vibration and noise levels. The correct "maximum instantaneous charge" and blast-hole sizes will be used to minimise flyrock generation.				
32.06	Public risk will be managed in accordance with the National standard for the control of major hazard facilities (2002) and the National code of practice for the control of major hazard facilities (1996) prepared by the National Occupational Health and Safety Commission and issued by Safe Work Australia.				

ID No.	Environmental commitment / condition	Comments / Compliance Evidence	A / O / N / C N / A	Findings	When (Date)
36	Additional Commitments made in the EIS Supplement				
36.01	The cetacean management plan will be extended to include dugongs. Also key management controls reconfirmed in SEIS: management measures to be employed through the cetacean management plan: Vessel masters to be trained in cetacean interaction procedures; vessels will be operated at "no wash" speed when within 50 – 150 m of a dolphin and will not intentionally approach a dolphin.				
37	NRETAS recommendations				
37.01	Recommendation 1 The proponent shall ensure that the proposal is implemented in accordance with the environmental commitments and safeguards: - Identified in the Ichthys Gas Field Development Project's Environmental Impact Statement (draft EIS and Supplement); and - Recommended in this Assessment Report. All safeguards and mitigation measures outlined in the Environmental Impact Statement are considered commitments by INPEX Browse Ltd and its joint venture partners.				
37.02	Recommendation 2 The proponent shall advise the Minister of any changes to the proposal in accordance with clause 14A of the Environmental Assessment Administrative Procedures, for determination of whether or not further assessment is required.				
37.16	Recommendation 10 Relevant EMPs are to be amended to include measures for minimising vessel interactions / collisions with dolphins, turtles, dugongs and other large marine fauna. The relevant plans should include: - details on procedures to reduce the risk of vessel strikes on large marine vertebrates (marine turtles, dugongs and cetaceans) such as speed limits; - requirements for installation of propeller guards on vessels associated with the Project; - details on procedures for monitoring and reporting of vessel strikes on large marine vertebrates; and - plans to monitor for stranded, injured or dead large marine vertebrates.				
37.27	Recommendation 15 Appropriate controls to mitigate risks from hydrotesting waste water must be included in the Liquid Discharges, Surface Water Runoff and Drainage Management Plan for Government approval. In preparing the plan, INPEX should also: - Investigate options for land-based disposal where practicable; and - Select chemical additives that have the lowest practicable risk to the marine environment.				
37.28	Further investigation of land-based disposal is needed to clearly demonstrate that this is not a viable option for all Project waste water, in 'Dry' season conditions.				

ID No.	Environmental commitment / condition	Comments / Compliance Evidence	A / O / N / C N / A	Findings	When (Date)
37.29	INPEX needs to explore further the potential for re-use of treated water in the process, which would potentially reduce reticulated water demand as well as discharge volumes.				
37.30	Discharges to the Harbour would be required to meet Water Quality Objectives for the Darwin Harbour Region. Where these are unable to be met INPEX would be expected to show just cause for seeking approval to discharge to the Harbour.				
37.31	All discharges to the Harbour require monitoring for a period prior to commencement of discharge to establish baseline data for determining impact of the discharge; validation of mixing zones where applicable (i.e. where water quality objectives cannot be met); monitoring during the life of the activity; and during remediation of the site on cessation of the activity.				
37.32	INPEX has an oil spill contingency plan (OSCP) that will be finalised and submitted to the NT Government for approval under the Disaster Act prior to the commencement of construction, commissioning and operations.				
37.34	It is expected that any monitoring activities following an oil spill would include assessment of impacts on marine fauna including mammals, turtles, fish and shore birds. Long-term monitoring of fish populations following an oil spill would be required to determine whether the event caused recruitment failure.				
37.41	Recommendation 21 The Blaydin Point gas facility must incorporate best-practice water conservation measures into the design. The proponent must commit to continuous improvement in minimising potable water use.				
37.44	Recommendation 23 All Environment Management Plans for the Ichthys Gas Field Development Project are to be submitted to Government for approval prior to commencement of any works for which the plans apply. In preparing each plan, the proponent will include any additional measures for environmental protection and monitoring contained in this Assessment Report and Recommendations. The plans shall be referred to relevant Northern Territory Government agencies and key stakeholders for review prior to finalisation. The plans shall form the basis for approvals and licences issued under relevant legislation. The proponent should provide public access to final environmental management plans and a reporting mechanism to inform compliance with the plans.				

APPENDIX A: CURRICULUM VITAE OF QUALIFIED AUDITOR

Paul Fridell

Partner
Environmental Auditor



Paul Fridell is a Partner within ERM based in Melbourne, Victoria, Australia.

Paul started his environmental consulting career in 1995 in the oil and gas sector and has progressed his career in a range of markets since including major infrastructure (ports/airports), dredging, waste management, government, property development, international aid and major construction environmental management.

Paul is a Victorian EPA appointed Environmental Auditor (*pursuant to the Environment Protection Act 1970*) and an SA EPA accredited site contamination auditor. Paul's Victorian appointment is jointly recognised by Northern Territory EPA as Qualified Person.

Appointments

- Victorian EPA Environmental Auditor
- South Australian EPA Site Contamination Auditor

Professional Affiliations & Registrations

- Member International Association of Hydrogeologists (MIAH)
- Member National Ground Water Association (US)
- Member of Association for Environmental Health and Sciences (US)

Education

- Master Environmental Science (Hydrogeology) University of Melbourne (2002)
- Bachelor Science (Geology & Geography), University of Melbourne (1996)

Key Industry Sectors

- Oil and Gas
- Mining
- Power
- Government
- Development

Key Expertise

- Waste Management;
- Contaminated Site Management;
- Dredging Environmental Impacts;
- Construction Environmental Management.

Publications

- L. Siraz, D. Noonan, P. Fridell, Development of diagnostic tools to detect groundwater impacts from landfills based on groundwater geochemistry. Landfill 2005 Conference, Brisbane, September 2005
- Fridell, P. S. and Ross, G., A Human Health Risk Assessment of Dust Emissions From a Landfill Licensed to Accept Low-Level Contaminated Soils. Enviro 04, Sydney, March 2004

Key Projects

East Arm Dredging Program, Ichthys Gas Field Development Project Australia, INPEX Operations Australia Pty Ltd (2012-2014). ERM provided INPEX Operations Australia Pty Ltd (INPEX) with environmental audit services for the East Arm dredging disposal management program as part of the Ichthys Gas Field Development Project (the Ichthys Project). The scope of the audit was an assessment of compliance with the project NT EPA Environmental Approval (EPA8) and the Dredging Spoil Disposal Management Plan. Paul completed the audits as an NT EPA “Qualified Person” in November 2012, April 2013, December 2013 and June 2014.

Gas Export Pipeline (GEP) Dredging Program, Ichthys Gas Field Development Project Australia, INPEX Operations Australia Pty Ltd (2014). ERM provided INPEX Operations Australia Pty Ltd (INPEX) with environmental audit services for the Gas Export Pipeline dredging disposal management program as part of the Ichthys Gas Field Development Project (the Ichthys Project). The scope of the audit was an assessment of compliance with the project NT Government (EPA) Environmental Approval (EPA9) and the Dredging Spoil Disposal Management Plan. Paul completed the audits as an NT EPA “Qualified Person” in March 2014 and July 2014.

Onshore Construction Environmental Management Plan (CEMP), Ichthys Gas Field Development Project Australia, INPEX Operations Australia Pty Ltd (2012-2014). ERM provided INPEX Operations Australia Pty Ltd (INPEX) with environmental audit of the Onshore Construction Environmental Management Plan (CEMP) as part of the Ichthys Gas Field Development Project (the Ichthys Project). The scope of the audit was an assessment of compliance with the project NT EPA Environmental Approval (EPA7) and the Construction Environmental Management Plans (Revision 04 and Revision 07). Paul completed the audits as an NT EPA “Qualified Person” in April 2013 and May 2014.

NT EPA Qualified Person Review of the Onshore Construction Environmental Management Plan (Revisions 7 and 11), Ichthys Gas Field Development Project Australia, JKC Australia Pty Ltd (2013 - 2014). ERM provided JKC Australia Pty Ltd with Environmental Auditor (Qualified Person) review of the Onshore Construction Environmental Management Plan (Revisions 7 and 12) as part of the Ichthys Gas Field Development Project (the Ichthys Project). The scope of the review undertaken by Paul was an assessment the environmental management measures

proposed in the Construction Environmental Management Plan for a variety of work packages including underwater piling, sewage outfall impacts, concrete batching plant, quarantine, hazardous materials, waste, dredging and general civil earthworks.

NT EPA Qualified Person Review of the Onshore Annual Environmental Monitoring Report (AEMR) (2014) Ichthys Gas Field Development Project Australia, JKC Australia Pty Ltd (2014). ERM provided JKC Australia Pty Ltd with environmental auditor (Qualified Person) review of the onshore Annual Environmental Monitoring Report prior to submission to NT EPA in July 2014. The scope of the review undertaken by Paul and the ERM expert team was a review of the findings and conclusions drawn from the data presented in the reports. Monitoring data reviewed included surface water, mangroves, dust, noise, groundwater and acid sulphate soils.

NT EPA Qualified Person review of the Onshore Environmental Impact Monitoring Program (EIMP), Ichthys Gas Field Development Project Australia, JKC Australia Pty Ltd (2014). ERM provided JKC Australia Pty Ltd with environmental auditor (Qualified Person) review of the onshore Environmental Impact Monitoring Program (EIMP) prior to submission to NT EPA. The scope of the review undertaken by Paul and the ERM expert team was a review of the proposed monitoring requirements considering the risk mitigation measures adopted in the CEMP and the results of the latest AEMR (2014). Monitoring requirements considered included surface water, mangroves, dust, noise, groundwater and acid sulphate soils..

Development Assistance and Review of the Onshore Drilling Waste Disposal Management Plan, Origin Energy, Australia (2012-2013). ERM provided assistance with the development of Origin Energy Drilling Waste Disposal Management Plan associated with onshore drilling for coal seam gas. The plan was developed as a requirement of the Environmental Approval to document and standardise the trench and cover disposal procedures proposed by Origin and ensure that the risks to the environment and human health remain low and acceptable.

Environmental Impact Assessment - Waste Management Strategy, Surat Basin, Australia - Queensland Gas Company (QGC) (2012). As a component of an overall EIA prepared by ERM, ERM Waste team in Melbourne Australia prepared the waste management and resource minimisation sections of EIA documentation in collaboration addressing potential

wastes generated from drilling operations, construction and demolition wastes and putrescible wastes generated by on-site workers.

Thevenard Island Facility, WA – Waste Management Plans for Cessation and Retirement, Chevron Australia (2013).

Technical specialist responsible for the technical delivery of the waste management plans for cessation (systematic shut down) and retirement (decontaminate, decommission and demolition) of Chevron's Thevenard Island Facility. Waste Management Plans were prepared in accordance with Chevron standards and with State and Federal legislation.

Annex C

Audit Evidence Tables

TABLE 2-1 EPA7-3
AUDITOR EVIDENCE TABLE - 18 -22 APRIL 2016

Condition No #	EPA7-3 Conditions	Comments/ Compliance Evidence	Findings	A/O/N/C
	Administrative			N/A
1	The Approval Holder must notify Administering Agency within 24 hours if there are changes to the details of the 24 hour emergency contact as provided on page one of this Approval	No changes during audit period.	No Change	A
2	The Approval Holder must notify Administering Agency within 14 days if there are changes to the Approval Holder's details as provided on page one of this Approval.	No changes during audit period.		NA
3	The Approval Holder must cause clear and legible signage to be displayed in a prominent location at the primary road entrance to the Location including the following details: 3.1. Environment Protection Approval number issued under the <i>Waste Management and Pollution Control Act</i> ; and 3.2. The 24 hour emergency contact details as provided on page one of this Approval or as amended in accordance with this Approval.	Sign sighted by Auditor at security area displaying 24 hour emergency contact approval number.	Acceptable Acceptable	A A
4	The Approval Holder must cause a copy of this Approval to be available at all times: 4.1 on the Approval Holder's Australian website; and 4.2 at the Location	http://www.inpex.com.au/our-projects/ichthys-lng-project/ichthys-commitments/approvals-permits/ EPA 7-3 viewed onsite.	Accessed website Copies available on-site in offices.	A A
5	Where this Approval requires the provision of any notice, document or other correspondence to the Administering Agency, the relevant contact is: Pollution Control Physical Address: Level 2 Darwin Plaza, 41 Smith Street Mall, Darwin NT 0800 Postal Address: GPO Box 3675, DARWIN NT 0801 Email: pollution@nt.gov.au	Email from Sandy Griffin to NT EPA Pollution Hotline dated 23rd of October 2015. (pollution@nt.gov.au).	Emails and letters sent to appropriate email addresses.	A A
6	All notices, documents or other correspondence required to be provided pursuant to this Approval must be provided in electronic form unless otherwise specified as a condition of this Approval.			A
	Operational			
7	The Approval Holder must at a minimum: 7.1 implement and comply with: ▪ Company, Ichthys Project, Ichthys Onshore LNG Facilities Construction Environmental Management Plan (Company document number L290-AH-PLN-0059) (CEMP), as revised and approved by the NT EPA; 7.2. comply with all applicable laws; and 7.3. comply with all permits and approvals issued in relation to the Activity	Refer to risk mitigation evidence tables for detailed assessment against specific CEMP mitigation measures		Refer to Table 2-3, CEMP Mitigation Measures
8	The Approval Holder must, without limiting any other condition of this Approval, in conducting the Activity do all things reasonable and practicable to ensure the Activity does not adversely affect the Declared Beneficial Uses and Objectives as declared from time to time, including those applying to: 8.1. the Elizabeth-Howard Rivers Region Groundwater; and 8.2. the Darwin Harbour Region.	By undertaking works in compliance with the above documents it is deemed that this condition is met. Any non-compliances or variations from the approved documents have been assessed to ensure that risks remain low and acceptable.		A
9	The Approval Holder must cause a copy of the current CEMP to be: 9.1. available on the Approval Holder's Australian website; and 9.2. provided to the Administering Agency.	CO75 - IPX - NRY - LE - 00207 dated 7 December 2015 EN2011/0234-03-0151 dated December 2015.	Accessible on website.	A
10	The Approval Holder must: 10.1 Submit all revisions of the CEMP to the Administering Agency for approval, other than minor revisions involving changes such as typographical changes or revisions to formatting and referencing to other documents; and 10.2 Submit a revised copy of the CEMP to the Administering Agency for information, when the revision has incorporated only minor changes, such as typographical or formatting changes or referencing to other documents.	" CO75 - IPX - NRY - LE - 00201 dated 4 September 2015 Revision 16. CO75 - IPX - NRY - LE - 00217 Submission of Revised Ichthys Onshore LNG Facilities Construction Environmental Management Plan . 1 April 2016." CO75 - IPX - NRY - LE - 00207 dated 7 December 2015 Revision 17.	Submission of revised CEMP (Rev 16) on 4 September 2015 and NT EPA conditionally approve Rev 16 of the CEMP on 11 November 2015 (NT EPA letter reference EN2011/0234-03-0142). Comments received from NT EPA and the updated CEMP (Rev 17) submitted on 7 December 2015. On 1 April 2016, INPEX prepared a Construction Environmental Management Plan based on information provided by the Subcontractor and submitted this document (L092-AH-PLN-10001, Rev.0) to the NT EPA for approval (reference 075-IPX-NRY-LE-00217). The change in revision sequence is explained as prior to April 2016 all revisions of the CEMP were prepared by JKC (contractor) using the document number L290-AH-PLN-0059. Submission of updated CEMP (Rev 17) submitted on 7 December 2015.	A A

TABLE 2-1 EPA7-3
AUDITOR EVIDENCE TABLE - 18 -22 APRIL 2016



Condition No #	EPA7-3 Conditions	Comments/ Compliance Evidence	Findings	A/O/N/C
				N/A
11	The CEMP must be revised and approved by the Administering Agency prior to commencing any works that are not addressed in an approved CEMP and will or may cause or increase the potential for environmental harm, such as by any increase of emissions or discharges.	EN2011/0234-03-151. Approval Ichthys Onshore LNG Facilities Construction Env Management Plan Revision 17 18 December 2015 EN2011/0234-03-0142 Approval of Ichthys Onshore LNG Facilities Construction Env Management Plan Revision 16 11 November 2015 Email dated 6 June 2015 from JKC to Company entitled: <i>Flare pad Risk Assessment</i> .	Conditional approval of Revision 16 by EPA on 11 November 2015. Approval of Revision 17 was approved by 18 December 2015. Revision 0 not yet approved therefore works currently being undertaken on-site as per Revision 17. It was noted during the audit that from approximately October 2015 there was an increasing tend of turbid water being disposed to the flare pad basin under Discharge Permits. The disposal of high turbid water is not specifically addressed in the CEMP (Rev 17). Section 5.2 of the outlines the change management process which requires a risk assessment. In this case a risk assessment was provided from Contractor to Company on 6 June 2015. This risk assessment also considered the monitoring requirements for this change in activity and deemed that the existing monitoring in the EIMP (Rev 6) was deemed sufficient.	A
12	Each revision of the CEMP must: 12.1. Address all works that will be conducted prior to approval of the next revision of the CEMP; 12.2. Be reviewed and endorsed by a qualified person as meeting the requirements of the <i>Waste Management and Pollution Control Act</i> , prior to submission to the Administering Agency; and 12.3 Be submitted to the Administering Agency for review (with a copy of the qualified person's certified review), at least 30 business days prior to implementation, noting the Administering Agency may require the Approval Holder to revise, amend and resubmit the CEMP.	Attached to submission's under 10.1	ERM reviewed Revision 16 and Revision 0.	A A
13	The Approval Holder must maintain and operate a 24 hour community telephone contact number and must ensure that the telephone number is provided: 13.1. in a prominent location on the Approval Holder's Australian website; and 13.2. in other publicly available documents relating to the Activity	http://www.inpex.com.au/our-projects/ http://www.inpex.com.au/our-projects/ichthys-lng-project/ichthys-commitments/environment/environmental-documents/	Community contact register is being maintained in accordance with the approval.	A A
14	The Approval Holder must maintain a log of all complaints made, in relation to the Activity, to any persons involved in the Activity. The log must include details of the following: - the date and time of the complaint; - the contact details of the complainant if known, or where no details are provided a note to that effect; - the nature of the complaint; - the nature of events giving rise to the complaint; - prevailing weather conditions at the time of the complaint; - the action taken in relation to the complaint, including any investigation or follow-up contact with the complainant; and - if no action was taken, why no action was taken. The log must be maintained for the duration of this Approval.	EPA 7-3 JKC May 2015 April 2014 Bladin Point. Community Complaints Log.	Weather station on-site that could be used to determine weather conditions on-site at time of any complaint.	A A A A A A A A A
15	The Approval Holder must maintain a log of events causing or threatening to cause pollution including, but not limited to, fires, accidental spillages and discharges to Darwin Harbour.	MYOSH system	INPEX is maintaining an appropriate register of all potential environmental hazards and environmental incidents (environmental events) with the MYOSH system.	A

TABLE 2-1 EPA7-3
AUDITOR EVIDENCE TABLE - 18 -22 APRIL 2016

Condition No #	EPA7-3 Conditions	Comments/ Compliance Evidence	Findings	A/O/N/C
				N/A
16	The Approval Holder must segregate waste for recycling, reuse or disposal.	Comingled recycling sighted in OPS-1 Area, segregation of wood waste during site visit. East Arm Civil Monthly Waste Report - March 2016 Spreadsheet.xcl (JKC document - subcontractor monthly waste reports). JKC Waste Data Trends 2016. Dated up to Feb 2016. Veolia. Concrete waste disposal sequence 0121. 25 January - TNK1 Area 5.pdf	Surface water: Over the last audit period, the greatest number of Discharge Water Permits allow water to discharge to the flare pad basin. Due to the additional testing requirements for on-site reuse of water, it is more expedient to discharge rather than reuse which is counter to the intention of this condition. Waste concrete: large stockpiles of waste concrete were observed on-site (CVL-4) which was explained as a contractual issue. Reuse options for concrete being considered for reuse on-site. Risk assessment being considered. Mansell (the other concrete plant on site) is using the recycled concrete as ground covering in its concrete plant. Oily water/waste oil is taken by Veolia O/W separator and oil taken to Mataranka for use in lime kiln - alternative fuel.	O
17	The Approval Holder must keep records of listed waste in accordance with Regulation 11 of the <i>Waste Management and Pollution Control (Administration) Regulations</i> .	EPA 7-3 AACR Spreadsheet February 2016. exl. (WST-1 document). 2783_001 2. pdf Waste Dockets. OPS-1 Transpacific Cleanaway. 168991. 2/2/2016. Veolia. INPEX Listed Waste Tracking Form. Listed Waste Register. Excl. updated to Feb 2016. 0030_BLK Tip Dockets 040116-100116.pdf Interstate Waste Tracking - May 2015 to present.xcl (JKC Document). 0025_Hazardous Materials. pdf Veolia Waste Docket 180223. Loads 1 22 October 2015. Waste manifest form - 04.08.2015. Con note - Toll NQX - 217 584 0566 - Waste transport con note NT EPA Waste Transport Cert. 90019827 - Completed Dated 30/10/2015.	Spent garnet and treated timber and contaminated soil go to Shoal Bay. Veolia provide rolling tracking sheet for solid listed waste disposed in Darwin. The audit team could track through a load of contaminated soil from site to Shoal Bay. Hazardous hydrocarbon solid waste and non hydrocarbon wastes go to Veolia Haz Waste disposal facility in South Australia - industrial incinerator. Some liquid waste to Victoria, halogenated substances to Geocycle (none sent as yet). Interstate waste tracking spreadsheet. Substantial improvement on waste tracking compared to last year.	A
Environmental Audit(s)				
18	An annual environmental audit must be undertaken by a qualified person to evaluate compliance with: ▪ this Approval; ▪ the <i>Waste Management and Pollution Control Act</i> ; and ▪ the <i>Water Act</i> .		Annual audits undertaken by ERM in 2015 and 2016.	A
19	The proposed scope for the environmental audit must be submitted, no later than 20 Business days prior to the proposed commencement date of the environmental audit (which must be specified when the proposed scope is submitted), to the Administering Agency for review and approval.	CO75 - IPX- NRY-LE-00215 dated 26 Feb 2016	Scope for Environmental Audit submitted on 26 Feb 2016.	A
20	The environmental audit must not commence until written approval is received from the Administering Agency noting that the Administering Agency may require the Approval Holder to revise, amend or resubmit the proposed scope.	EN2011/0234/03-0172 dated 11 April 2016	Audit commenced on 18 April 2016, 7 days after approval.	A
21	The environmental audit report must be: 21.1. completed within two calendar months of receipt of approval from the Administering Agency unless otherwise agreed; 21.2. signed by the qualified person conducting the audit; and 21.3. provided in full to the Administering Agency within five Business Days of being signed by the qualified person conducting the audit.	CO75-IPX-NRY-LE-00195 dated 19 June 2015 EN2011/0234-03-0089 dated 30 March 2015 CO75-IPX-NRY-LE-00195 dated 19 June 2015	Environmental audit report provided on 19 June 2015. NT EPA approved submission date of 19 June for each audit. Signed 17 June 2015 and delivered on 19 June 2015.	A A A
Monitoring				
22	The Approval Holder must submit a monitoring plan to assess environmental impacts of the Activity to the Administering Agency by 1 June 2012. The monitoring plan must be: 22.1. approved by the Administering Agency, noting that the Administering Agency may require the Approval Holder to revise, amend and/or resubmit the proposed monitoring plan; and 22.2. implemented within 10 Business Days, unless otherwise agreed, of receiving written approval of the monitoring plan from the Administering Agency.	No Change since last year's audit. No Change since last year's audit.		NA NA NA
23	Any proposed revisions of the monitoring plan must be: 23.1. submitted to the Administering Agency for review; and 23.2. approved by the Administering Agency prior to implementation noting that the Administering Agency may require the Approval Holder to revise, amend and/or resubmit the proposed revision.	No Change since last year's audit. No Change since last year's audit.	INPEX submitted EIMP rev 6 to NT EPA EPA approved Revision 6 of EIMP on 2 April 2015.	A A

TABLE 2-1 EPA7-3
AUDITOR EVIDENCE TABLE - 18 -22 APRIL 2016



Condition No #	EPA7-3 Conditions	Comments/ Compliance Evidence	Findings	A/O/N/C
	Reporting			N/A
24	The Approval Holder must as soon as practicable, and in any case within 24 hours, after first becoming aware notify the Administering Agency of non-compliances, that are not trivial or negligible, with this Approval.	INPEX Environmental Incident Register_onshore only.xcl provided		A
25	Records must be kept of all non-compliances, including those assessed as trivial or negligible, with this Approval.	MYOSH system - LPI - Loss prevention Inspection viewed during site visit. Environmental Incidents - 1 May 2015 to 16 April 2016 - Print out from Myosh viewed during site visit. Environmental Hazards - 1 May 2015 to 16 April 2016 - Print out from Myosh viewed during site visit. INPEX Environmental Incident Register_onshore only.xcl provided	LPI = Loss Prevention Inspections (LPI) by area - assessment of compliance. If an item need improvement of unacceptable becomes an Environmental Hazard report or Environmental Incident. Environmental hazards are situations that are not compliant that may cause an incident. These are risk assessed and Company has full visibility and company can see these documents and notification is sent. Trending data on environmental incidents.	A
26	The Approval Holder must comply with the requirements of section 14 of the <i>Waste Management and Pollution Control Act</i> .	Environmental Incident Register_Onshore only. Dated 9.12.2015	INPEX is maintaining an appropriate register of all potential environmental hazards and environmental incidents. Based on review of the incident register, INPEX it is the Auditor's opinion that INPEX is complying with duties under Section 14.	A
27	The Approval Holder must immediately and in any case within 24 hours notify the Administering Agency of any potential or actual environmental harm or pollution by contacting the Pollution Hotline on telephone number 1800 064 567 and emailing pollution@nt.gov.au.	Email from Sandy Griffin to NT EPA Pollution Hotline dated 9 of December 2015. (pollution@nt.gov.au). For Hydrotest tank leak GEP date of incident 9 December 2015. Email from Sandy Griffin to NT EPA Pollution Hotline dated 23 of October 2015. (pollution@nt.gov.au). For tridol spill reported to the Approval holder 22 October 2015.	All incidents deemed notifiable by the auditor have been notified.	A
28	The Approval Holder must complete the Annual Audit and Compliance Report (AACR), Appendix 1, and provide to the Administering Agency within two calendar months of the anniversary of the commencement date of this Approval for each year of the Approval unless otherwise agreed.	CO75 - IPX - NRY - LE - 00194 - Dated 19 June 2015.	Submitted 19 June 2015.	A
29	The Approval Holder must submit a monitoring report to the Administering Agency within two calendar months of the anniversary of the commencement date of this Approval for each year of the Approval unless otherwise agreed. The monitoring report must 29.1 include but is not limited to a trend analysis and interpretation of analytical data collected as a condition of this Approval; and 29.2 be made available on the Approval Holder's Australian website	EN2011/0234-03-0078 dated 26 February 2015 CO75 - IPX-NRY-LE-00196 31 July 2015 L 290 - AH - REP - 10244 dated 31-07-2015 http://www.inpex.com.au/search/?term=AEMR	NT EPA extended submission date to 31 July for all years under the approval. Submission of AEMR on 31 July	A

TABLE 2-2 Commitments
AUDITOR EVIDENCE TABLE - 18 -22 APRIL 2016

ID No.	Environmental commitment/condition	Comments/ Compliance Evidence	Findings	A/O/N/C
1	General			N/A
1.01	The Ichthys Project's Health, Safety and Environmental Management Process will align with the requirements of AS/NZS ISO 14001:2004, Environmental management systems—Requirements with guidance for use and AS/NZS 4801:2001 Occupational health and safety management systems—Specification with guidance for use.		Compliant. CEMP adopts similar risk assessment principles.	A
2	Receiving Environment Monitoring			
2.01	Wastewater discharge monitoring will be undertaken in the nearshore environment to confirm modelling predictions for wastewater dispersion.	EIMP Rev 6 L290-AH-PLN-10016	Compliant.	A
2.02	A Darwin Harbour water-quality monitoring program will be developed and implemented to determine if Project wastewater discharges are adversely impacting on water quality in the Harbour.	EIMP Rev 6 L290-AH-PLN-10016	Compliant	A
2.03	A marine sediments and bio-indicators monitoring program will be developed and implemented to determine if construction activities undertaken in acid sulfate soils have resulted in changes in pH and in the bio-availability of heavy metals in adjacent marine sediments.	EIMP Rev 6 L290-AH-PLN-10016	Compliant	A
2.10	A groundwater quality monitoring program will be developed to determine if activities in the onshore development area adversely impact on groundwater quality.	EIMP Rev 6 L290-AH-PLN-10016	Compliant	A
2.13	Airborne noise monitoring will be undertaken to confirm modelling predictions.	EIMP Rev 6 L290-AH-PLN-10016	Compliant	A
2.14	A marine pests monitoring program will be developed for the nearshore development area. This will be developed in consultation with the relevant agencies.	EIMP Rev 6 L290-AH-PLN-10016	Compliant	A
2.15	A weed monitoring program will be developed to monitor the distribution and abundance of listed weeds species in the onshore development area.	EIMP Rev 6 L290-AH-PLN-10016	Compliant	A
2.16	A vegetation rehabilitation monitoring program will be developed and periodic surveys of rehabilitated areas will be undertaken to determine the level of success of rehabilitation programs.	EIMP Rev 6 L290-AH-PLN-10016	Compliant	A
2.17	A mangrove health monitoring program will be developed to assess the potential effects of Project activities on mangrove health. Additional commitment within the EIS Supplement; mangrove monitoring to be undertaken throughout construction and operation and sediment heights throughout construction.	EIMP Rev 6 L290-AH-PLN-10016	Compliant	A
2.18	INPEX will consider undertaking fish monitoring to detect changes, beyond natural variation, of key fish species, abundance/distribution resulting from Project construction impacts (e.g. noise, dredging, blasting)	Dredging scope. Report on web site.	Compliant	A
3	Alteration of Marine Habitats			
3.03	Antifouling paints used on offshore and nearshore infrastructure will be selected in accordance with regulatory-authority requirements.		Assessed in previous audits.	NA
5	Accidental Marine Hydrocarbon Spills			
5.11	Hydrostatic testing of the gas export pipeline will be undertaken prior to the introduction of hydrocarbons.		Hydrostatic testing being undertaken.	A
5.18	Appropriate spill response equipment will be available on the CPF, the FPSO, and the supply and pipelay vessels as well as at the onshore and nearshore facilities. Regular pollution response exercises will be undertaken.	Not applicable to the current audit.	Assessed in previous audits. No construction vessel activities occurring during audit period.	NA
5.19	Visual monitoring of hoses, couplings and the sea surface will be undertaken during refuelling operations.	Not applicable to the current audit.	Assessed in previous audits. No construction vessel activities occurring during audit period.	NA
5.20	Radio contact will be maintained between refuelling vessels and the offshore facilities or other vessels when refuelling activities are being undertaken.	Not applicable to the current audit.	Assessed in previous audits. No construction vessel activities occurring during audit period.	NA
5.22	Dry-break, breakaway couplings or similar technology will be installed and used where practicable during refuelling operations.	Not applicable to the current audit.	Assessed in previous audits. No construction vessel activities occurring during audit period.	NA
5.26	The jetty structure is being designed according to Australian Standard AS 4997:2005, Guidelines for the design of maritime structures (taking cyclones into account). The jetty loading arms will be designed to allow them to be tied down in the event of a cyclone.	Not applicable to the current audit.	Assessed in previous audits. No construction vessel activities occurring during audit period.	NA
7	Underwater noise and blast emissions			
7.02	A Piledriving and Blasting Management Plan and supporting documentation will be produced and their prescriptions will be implemented.	Not applicable to the current audit.	Assessed in previous audits. No piledriving occurring during audit period.	NA
7.12	Piledriving activities are planned to be undertaken during daylight hours only. Night-time piledriving would only be required if Project construction activities were to fall significantly behind schedule.	Not applicable to the current audit.	Assessed in previous audits. No piledriving occurring during audit period.	NA
7.13	An observation zone with a radius of 100 m will be designated at the commencement of piledriving activities. This area will need to be confirmed as being clear of cetaceans, dugongs, turtles and crocodiles for 10 minutes prior to the start of operations. EIS Supplement: Changes to the "observation zone" for visual monitoring to 500m for at least 30 minutes.	Not applicable to the current audit.	Assessed in previous audits. No piledriving occurring during audit period.	NA
7.14	Piledriving will commence with a "soft-start" procedure, where activities are gradually scaled up over a 5-minute period. This will provide an opportunity for any sensitive marine fauna to leave the area before being exposed to the full intensity of underwater noise. EIS Supplement: Soft-start not to proceed until animal has moved outside the zone or is not sighted for 30 minutes; visual monitoring will continue during piledriving works and for 10 minutes after stoppage; Piledriving will temporarily cease if marine mammals approach within 100 m of the piling operation and will not recommence until animals have been observed to have moved outside the observation zone (500 m) or it is not sighted in the observation zone for 30 minutes.	Not applicable to the current audit.	Assessed in previous audits. No piledriving occurring during audit period.	NA
7.15	A permit to work (or similar) system will be implemented to ensure that areas where blasting and piledriving activities are occurring, or will occur, are clearly identified and that management measures are in place prior to work commencing.	Not applicable to the current audit.	Assessed in previous audits. No piledriving occurring during audit period.	NA

TABLE 2-2 Commitments
AUDITOR EVIDENCE TABLE - 18 -22 APRIL 2016

ID No.	Environmental commitment/condition	Comments/ Compliance Evidence	Findings	A/O/N/C
8	Marine Pests			N/A
8.01	Quarantine management plans and supporting documentation will be developed and their prescriptions will be implemented in accordance with the requirements of the Department of Agriculture, Fisheries and Forestry (DAFF), the Northern Territory's Department of Primary Industry and Fisheries, and the DPC.	Not applicable to the current audit.	Assessed in previous audits. No construction vessel activities occurring during audit period.	NA
8.02	INPEX will ensure that vessels engaged in Project activities comply with the biofouling requirements of the regulatory authorities.	Not applicable to the current audit.	Assessed in previous audits. No construction vessel activities occurring during audit period.	NA
8.03	Vessels engaged in Project work will be subjected to a biofouling risk assessment which may result in hull inspections or cleaning.	Not applicable to the current audit.	Assessed in previous audits. No construction vessel activities occurring during audit period.	NA
8.04	Relevant Project vessels will be required to maintain satisfactory records of antifouling management, hull-cleaning actions and ballast-water exchange.	Not applicable to the current audit.	Assessed in previous audits. No construction vessel activities occurring during audit period.	NA
9	Marine Megafauna			
9.01	A cetacean management plan and supporting documentation will be developed and their prescriptions will be implemented. EIS Supplement: The cetacean management plan will be extended to include dugongs. Also key management controls reconfirmed in SEIS: management measures to be employed through the cetacean management plan: Vessel masters to be trained in cetacean interaction procedures; vessels will be operated at "no wash" speed when within 50–150m of a dolphin and will not intentionally approach a dolphin.	Not applicable to the current audit.	Assessed in previous audits. No construction vessel activities occurring during audit period.	NA
9.02	Procedures for avoiding interactions between cetaceans and vessels or helicopters will be developed and implemented.	Not applicable to the current audit.	Assessed in previous audits. No construction vessel activities occurring during audit period.	NA
11	Soil Erosion			
11.01	A vegetation clearing, earthworks and rehabilitation management plan and supporting documentation will be produced and their prescriptions will be implemented.	Not applicable to the current audit.	Assessed in previous audits.	NA
11.02	A liquid discharges, surface-water runoff and drainage management plan and supporting documentation will be produced and their prescriptions will be implemented.	Addressed as part of the CEMP.		A
11.03	Surface-water drains and discharge points throughout the onshore development area will be designed to minimise erosion.	Discharge locations are considered in ESCPs and sighted on-site.		A
11.04	Erosion protection infrastructure (e.g. silt fencing, contouring, and sediment ponds) will be installed to ensure that sediment is contained within the onshore development area as far as is practicable.	Erosion sediment control plans. Refer to Mitigation measure 6.5.05.		A
11.05	If soil erosion is evident, exposed surfaces at the affected area will be stabilised with mulched vegetation, dust suppressants or slope-stabilisation products.	Mulched Vegetation, soil stabilising polymer and water trucks witnessed on site during audit.		A
11.06	Large-scale vegetation clearing and earthworks will preferentially be undertaken in dry-season conditions. Should clearing and earthworks be required to be undertaken during the wet season, adequate erosion and sedimentation control measures will be implemented to avoid any possible impacts.	Mulched Vegetation, soil stabilising polymer and water trucks witnessed on site during audit.		A
12	Acid Sulfate Soils			
12.01	An acid sulfate soil (ASS) management plan and supporting documentation will be developed and their prescriptions will be implemented.	Addressed as part of the CEMP.		A
12.02	Onshore facilities will be designed to minimise excavation of ASSs.	Not applicable to the current audit.		NA
12.03	If excavation of ASS is unavoidable, further testing to determine management and disposal options will be undertaken. Disposal options for ASSs include dumping at an offshore disposal ground; treatment of the ASSs with neutralising agents and reuse of the treated ASS as fill material; or treatment of the ASSs with neutralising agents followed by disposal of the treated ASS material off site. EIS Supplement: INPEX is currently investigating ASS management and, as a priority, actual ASS or potential ASS will be managed in situ with disturbance and movement kept to the minimum, or treated with neutralising agents.	Not applicable to the current audit.	Addressed in previous audits.	NA
13	Alteration to Surface and Groundwater			
13.01	A liquid discharges, surface water runoff and drainage management plan and supporting documentation will be produced and their prescriptions will be implemented.	Erosion sediment control plans. Refer to Mitigation measure 6.5.05.	Part of design	NA
13.02	Culverts will be installed to maintain natural tidal flows underneath the causeway between Bladin Point and Middle Arm Peninsula.	This has been constructed.	Part of design	NA
13.03	Numerous surface water drains will be constructed around the perimeter of the onshore development area, which, where applicable, will distribute fresh water to mangrove areas.	This has been constructed.	Part of design	NA
13.04	Some areas on Bladin Point will remain uncleared or unsealed, which will allow for some groundwater recharge by rainfall.	Not applicable to the current audit	Part of design	NA

TABLE 2-2 Commitments
AUDITOR EVIDENCE TABLE - 18 -22 APRIL 2016

ID No.	Environmental commitment/condition	Comments/ Compliance Evidence	Findings	A/O/N/C N/A
14	Vegetation Clearance			
14.01	A vegetation clearing, earthworks and rehabilitation management plan and supporting documentation will be produced and their prescriptions will be implemented.	Addressed as part of the CEMP.		
14.02	Areas to be cleared will be clearly identified prior to work commencing. Clearing boundaries will be marked in the field and on site plans, and a register of clearing activities will be maintained.	Not applicable to the current audit.		NA
14.03	The vegetation-clearing footprint for the onshore development area will be minimised during the design of the onshore facilities, subject to constructability and safety operating requirements. EIS Supplement: Confirmed landtake in SEIS as 413 ha with 362 ha of vegetation take (61 ha Monsoon vine thicket; 82 ha mangroves and 73 ha Melaleuca); Temporarily disturbed areas such as those in the vicinity of the pipeline shore crossing and onshore pipeline route will be reinstated and rehabilitated, as will any areas around the plant that do not need to remain cleared.	Not applicable to the current audit.		NA
14.04	All disturbances, including personnel and vehicle movement, will be contained within the designated onshore development area to avoid impacts to surrounding vegetation. Some additional clearances may be required around the perimeter of the site to allow for appropriate firebreaks.		No significant vegetation impacts beyond the designated clearance area were reported during audit period.	A
14.05	Temporarily disturbed areas such as those in the vicinity of the pipeline shore crossing and the onshore pipeline corridor, as well as areas around the plant that do not need to remain cleared, will be rehabilitated following the completion of construction activities.		Topsoil stockpiled along the GEP corridor restored in rehabilitation process.	A
14.06	Some topsoil will be stockpiled from cleared areas for future use in rehabilitation.		Evidence of topsoil stockpiling sighted during site visit.	A
14.07	Cleared vegetation will be mulched and stockpiled on site boundaries. Where possible, the mulch will be used for both rehabilitation and soil stabilisation to prevent erosion. Cleared vegetation that cannot be reused will be disposed of off site. No stockpiled vegetation will be burned.		Evidence of vegetation mulching and stockpiling sighted during site visit.	A
15	Alteration of Terrestrial Habitats			
15.01	A vegetation clearing, earthworks and rehabilitation management plan and supporting documents will be produced and their prescriptions will be implemented.	Addressed as part of the CEMP.		A
15.02	Major clearing activities will be undertaken in such a manner as to allow animals to move into remaining surrounding vegetation.	Not applicable to the current audit.		NA
15.03	"High-risk" entrapment areas (e.g. deep trenches or pits) will be constructed with sloping egress ramps to allow trapped animals to escape. Targeted inspections will be undertaken of these areas and any animals which have been unable to escape will be removed and released.	Not applicable to the current audit.		NA
16	Creation of Breeding Habitat for Biting Insects			
16.01	Natural drainage will be maintained around roads by installing drains and/or culverts, particularly in intertidal areas such as the causeway between Bladin Point and Middle Arm Peninsula.	Such culverts and drains were sighted onsite.		A
16.02	Surface-water drainage channels throughout the onshore development area will be designed to minimise the creation of breeding habitat for biting insects. Drains will be kept free of vegetation.	No significant vegetation observed in onshore drainage onsite.		A
16.03	Regular inspections will be carried out for mosquito larvae in high-risk areas and controls will be implemented as required.	Not assessed during current audit.		NA
16.04	Temporary sedimentation systems will be designed to minimise their potential to become breeding habitat for biting insects.	Not assessed during current audit.		NA
17	Introduced Species			
17.01	Quarantine management plans and supporting documentation will be developed and their prescriptions will be implemented in accordance with AQIS, DoR and DPC requirements.	Not assessed during current audit.		NA
17.02	A vegetation clearing, earthworks and rehabilitation management plan and supporting documentation will be produced and their prescriptions will be implemented.	Not assessed during current audit.		NA
17.03	Topsoil containing high densities of weed seeds will not be used in rehabilitation.	Not assessed during current audit.		NA
17.04	Infestations of listed weeds will be controlled in the onshore development area and along the access road from Wickham Point Road.	Not assessed during current audit.		NA
17.05	Machinery used for earthmoving and vegetation-clearing will be cleaned and inspected prior to commencement of work at the onshore development area to identify any attached material that should be removed for quarantine reasons.	Not assessed during current audit.		NA
17.06	A temporary washdown area for earthmoving and vegetation-clearing vehicles will be built for the construction phase.	Not assessed during current audit.		NA
17.07	A temporary dedicated "quarantine-approved premises" (QAP) area will be provided for on Bladin Point during the construction phase. The QAP will be designed to meet AQIS requirements.	Not assessed during current audit.		NA
17.08	Inspections of incoming vessels and modules will be undertaken in accordance with AQIS standards.	Not assessed during current audit.		NA
18	Bushfire Prevention			
18.01	A bushfire prevention management plan and supporting documentation will be produced and their prescriptions will be implemented.	Not assessed during current audit.		NA
18.02	Firebreaks will be established around Project infrastructure which borders woodlands. Advice will be sought from the Northern Territory's Bushfires Council on firebreak requirements for Bladin Point.	Not assessed during current audit.		NA
18.03	A firefighting capability will be available and strategically located firefighting stations will be established at the onshore Project site.	Not assessed during current audit.		NA
18.04	Firefighting equipment will be available on site at all times, along with accessible supplies of water.	Not assessed during current audit.		NA
18.05	Grassy vegetation in the onshore development footprint will be controlled to reduce available fuel loads and prevent wildfire. Control methods may include slashing and spraying.	Not assessed during current audit.		NA
18.06	Cleared vegetation will be stockpiled in designated areas, away from potential ignition sources.	Not assessed during current audit.		NA
18.07	An internal "hot work" permit system will be implemented for cutting, welding and any other work considered to have a high potential to start a fire.	Not assessed during current audit.		NA
18.08	Designated smoking areas will be established for all phases of the Project and receptacles for cigarette butts will be provided.	Not assessed during current audit.		NA

TABLE 2-2 Commitments
AUDITOR EVIDENCE TABLE - 18 -22 APRIL 2016



ID No.	Environmental commitment/condition	Comments/ Compliance Evidence	Findings	A/O/N/C
19	Dust Emissions			N/A
19.01	A dust management plan and supporting documentation will be produced and their prescriptions will be implemented.	CEMP addressed dust mitigation.		A
19.02	Monitoring of dust generation and the effectiveness of management controls will be regularly undertaken.	EIMP Rev 6 L290-AH-PLN-10016		A
19.03	Dust suppression techniques will be applied where necessary to protect vegetation health, worker health and amenity. This may include spraying from water trucks, irrigation, or stabilisation and revegetation of cleared areas that are no longer needed as soon as practicable during construction.	Water trucks and water reuse permits sighted during audit for dust suppression.		A
19.04	On-site roads required for the operations phase will be sealed during the construction phase.	Onsite roads cement sealed		A
19.05	Multiple handling of soil or rock materials will be minimised.	Not assessed during current audit.		NA
19.06	Loads in all trucks transporting soil, aggregate or other dust-generating materials to and from the onshore development area will be wetted down to reduce dust.	Not assessed during current audit.		NA
21	Onshore Spills and Leaks			
21.01	An onshore spill prevention and response management plan and supporting documentation will be produced and their prescriptions will be implemented.	CEMP addresses spill prevention and response		A
21.02	Onshore facilities will be designed and constructed in such a way that spills and leaks can be constrained or isolated, particularly in areas where there is an elevated risk of spill.	design element.		A
21.03	Material safety data sheets (MSDSs) will be available on the facilities to aid in the identification of appropriate spill clean-up and disposal methods.	MSDS's sighted in Haz chem storage areas and on bunded containers.		A
21.04	Chemicals and hazardous substances used during all phases of the Project will be selected and managed to minimise the potential adverse environmental impact associated with their transport, transfer, storage, use and disposal.	All chemicals used onsite are selected based on the Contractor Chem Alert system. ChemAlert system sighted during Audit.		A
21.05	Spill response materials and equipment (including personal protective equipment) will be available during all phases and will contain equipment to combat both chemical and hydrocarbon spills.	Spill Kits and Fire extinguishers observed around contractor and subcontractor areas of the site during audit.		A
21.06	Personnel who routinely handle hazardous materials or wastes (e.g. refuelling personnel, pump operators, mechanics, and stores personnel) will receive training in handling, transporting and storing hazardous materials or wastes; in reporting and documentation requirements; and in spill clean-up techniques and practices.	Part of induction.		A
21.07	During construction of the onshore facilities, appropriate temporary containment facilities will be utilised for the storage of chemicals, fuel and hazardous waste until permanent infrastructure is in place.	Risk assessment for bunded area in OPS-1 waste area. Storage of Transformer Oils (C2) dated 18/06/2015.		A
22	Waste			
22.01	A waste management plan and supporting documentation will be developed and their prescriptions will be implemented.	CEMP addresses waste management with the waste hierarchy used to guide waste management for construction.		A
22.02	Waste minimisation will be included in the tendering and contracting process.	Waste Management Procedure Distribution List dated 17.08.15		A
22.04	Chemicals and hazardous substances used during all phases of the Project will be selected and managed to minimise the potential adverse environmental impact associated with their disposal.	All chemicals used onsite are selected based on the Contractor Chem Alert system. ChemAlert system sighted during Audit.		A
22.05	During the early construction phase, appropriate temporary containment facilities will be available for storing waste until permanent infrastructure is in place.	Waste Containment Facilities have been constructed onsite for use during construction phase and were sighted during Audit.		A
22.06	All solid-waste receptacles (e.g. skips and bins) will have covers and be fit for purpose and in good condition. This will prevent scavenging animals from gaining access to putrescible wastes.	Solid waste receptacles were observed in good condition onsite.		A
22.07	All hazardous liquid wastes will be stored over a bund in leakproof sealed containers.	Appropriate bunded pallets and containers observed in use on site for liquid waste storage.		A
22.08	Only approved and licensed waste contractors will be engaged for waste disposal.	Veolia and Transpacific utilised onsite both listed in NT EPA licenced contractors register.		A
22.09	Waste will be stored in the designated waste stations and appropriately segregated into hazardous waste and non-hazardous waste, and, where possible, into recyclable or reusable hazardous waste and recyclable or reusable non-hazardous waste. In the event of the discovery of any unidentified wastes, these will be treated as hazardous waste and stored accordingly.	Waste Containment Facilities have been constructed onsite for use during construction phase and were sighted during Audit.		A
22.15	All hazardous and non-hazardous solid wastes generated in the nearshore development area, including food scraps, will be retained on board vessels and transported to onshore facilities for disposal in accordance with the Marine Pollution Act (NT).	Evidence of waste segregation in waste containment facility observed onsite. Not applicable to current audit.		NA

TABLE 2-2 Commitments
AUDITOR EVIDENCE TABLE - 18 -22 APRIL 2016



ID No.	Environmental commitment/condition	Comments/ Compliance Evidence	Findings	A/O/N/C
23	Liquid Discharges			N/A
23.01	A liquid discharges, surface water runoff and drainage management plan and supporting documentation will be developed and their prescriptions will be implemented.	Addressed as part of the CEMP.		A
23.04	Hydrotest management plans and supporting documentation will be developed prior to pre-commissioning for approval under the relevant legislation.	Water Discharge Procedure L290-AB-PRC-10265 Addressed as part of the CEMP.		A
23.05	A chemical selection process will be developed and will include consideration of the potential for ecotoxicity.	Water Discharge Procedure L290-AB-PRC-10265	All chemicals used onsite are selected based on the Contractor Chem Alert system. ChemAlert system sighted during Audit.	A
23.11	Construction vessels, supply vessels and the mobile offshore drilling unit (MODU) will adhere to the following prescriptions laid down by the Protection of the Sea (Prevention of Pollution from Ships) Act 1983 (Cwth) and the Marine Pollution Act (NT): Sewage will not be discharged within three nautical miles of land. Only treated sewage (macerated to fragment diameters less than 25 mm) will be discharged between three and twelve nautical miles of land. Untreated sewage may be discharged beyond 12 nautical miles of land.	Not applicable to current audit.		NA
23.12	Antifouling paints containing tributyltin compounds (TBTs) will not be used on any Project vessels or equipment in accordance with the prescriptions of the International Maritime Organization's International Convention on the Control of Harmful Anti-fouling Systems on Ships and the Protection of the Sea (Harmful Anti-fouling Systems) Act 2006 (Cwth).	Not applicable to current audit.		NA
23.14	Oil-in-water concentrations from the bilge discharges of construction and supply vessels, including the MODU, will meet the regulatory requirements of <15 mg/L in accordance with Annex I of the International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 relating thereto (MARPOL 73/78) and the Marine Pollution Regulations (NT). EIS Supplement: INPEX will treat produced water to a specification of 30mg/L hydrocarbon; will use an online analyser that will measure dispersed hydrocarbons. INPEX plans to use MPPE technology.	Not applicable to current audit.		NA
23.16	The wastewater outfall diffuser will be designed to optimise near-field dispersion of the discharged wastewater.	Design element. Not applicable to current audit.		NA
23.17	Drainage at the onshore development area will be designed to isolate areas that could be exposed to hydrocarbon contamination. Wastewater from these areas will be directed to an oily-water treatment system.	Main refuelling area and transformer oil storage area inspection.	Main refuelling area and transformer oil storage area observed during audit and confirmed that appropriate isolation, bunding and water treatment systems were in place.	A
23.19	Wastewater streams will be sampled at appropriate frequencies and selected water-quality parameters will be documented.	Hydrotest discharge Permit - 000811 - date 18/04/2014		
23.2	Maintenance practices during the operations phase (e.g. drainage of hydrocarbons from tanks and equipment) will avoid discharge of hydrocarbons to the oily-water treatment system.	Not applicable to current audit.		NA
25	Housing, Social Infrastructure and Services			
25.03	A first aid capability will be available at the onshore facility during both the construction and the operation phases.	Assessed in previous audits		NA
25.04	INPEX will work in conjunction with the Northern Territory Police, Fire and Emergency Services in order to plan effectively for any major emergencies.	Assessed in previous audits		NA
25.05	A firefighting capability will be available and strategically located firefighting stations will be established at the onshore Project site.	Assessed in previous audits		NA
25.07	Appropriate quantities of water will be stored and made available for firefighting purposes during both the construction and operations phases at the onshore Project site.	Assessed in previous audits		NA
25.08	An emergency response plan will be developed and emergency response teams will be established at the onshore Project site for both the construction and the operations phases of the Project.	Assessed in previous audits		NA
25.1	Temporary ablation blocks and sewage systems will be in place at the onshore Project site to meet sewage management requirements during the construction phase.	Assessed in previous audits		NA
25.12	Waste-disposal facility capabilities for the construction and operations phases at the onshore Project site will be addressed during the detailed design phase of the Project; this will be done in consultation with relevant local government authorities.	Assessed in previous audits		NA
25.13	Ongoing consultation will be undertaken with local government, the Department of Lands and Planning and Infrastructure (DLP) and the Power and Water Corporation (PWC) in order to plan effectively for the provision of scheme water for Project requirements at the onshore Project site.	Assessed in previous audits		NA
26	Onshore Traffic			
26.01	A traffic management plan and supporting documentation will be produced and their prescriptions will be implemented.	Assessed in previous audits		NA
26.04	Designated routes for travel from quarries, the accommodation village, the Darwin central business district, airport and East Arm Wharf will be set for the Project. The selection process for the routes will give consideration to minimising disturbance to local traffic and will be communicated to all relevant personnel. EIS Supplement	Assessed in previous audits		NA
27	Marine Traffic			
27.04	Shipping traffic schedules during the construction and operations phases will be developed in consultation with the DPC to minimise the impacts of marine traffic on Darwin Harbour.	Not assessed during current audit.		NA
27.05	An application will be made to the relevant government and regulatory agencies to implement safety exclusion zones and restricted navigation zones around LNG, LPG and condensate tankers, and around selected construction vessels such as dredging and pipelay vessels.	Not assessed during current audit.		NA

TABLE 2-2 Commitments
AUDITOR EVIDENCE TABLE - 18 -22 APRIL 2016

ID No.	Environmental commitment/condition	Comments/ Compliance Evidence	Findings	A/O/N/C
28	Heritage			N/A
28.01	Heritage management plans and supporting documentation will be developed and their prescriptions will be implemented.	Assessed in previous audits		NA
28.02	A Larrakia Heritage Management Committee (LHMC) will be established. It will be made up of representatives of the Larrakia people and INPEX and will have a standing agenda.	Assessed in previous audits		NA
28.03	Prior to commencement of construction, Aboriginal sites in the onshore development area will be divided into two categories: those which will receive full protection from disturbance and those which may need to be removed. EIS Supplement: INPEX has made alterations to the onshore design to avoid disturbance of known heritage sites within the pipeline corridor and combined operations complex; INPEX has agreed to increase the distance for flagging and fencing of Aboriginal heritage sites to 50m, or to the greatest extent possible where 50m may not be possible.	Assessed in previous audits		NA
23.04	In the case of an Aboriginal heritage site which may have to be moved, INPEX will request permission to do so from both the LHMC and the Heritage Branch of the Northern Territory's Department of Natural Resources, Environment, the Arts and Sport (NRETAS). If permission is granted to remove the site, advice will be sought from the traditional custodians on the correct procedures to be adopted for its removal.	Assessed in previous audits		NA
28.05	Where the external boundary of an Aboriginal heritage site is 10 m or closer to any proposed construction activity, flagging, temporary fencing or similar will be erected 5 m from the site boundary and appropriate signage will be put in place if required by the Larrakia people. The boundary demarcation will be removed when the risk of disturbance no longer exists.	Assessed in previous audits		NA
28.06	Daily toolbox meetings, job hazard analyses, permit systems or similar will be implemented on site prior to the commencement of vegetation-clearing or construction activities. These will be undertaken to ensure that work areas are clearly identified before operations commence to avoid accidental disturbance to heritage sites either inside or outside the heritage site boundaries.	Assessed in previous audits		NA
28.07	Anchor management plans will be developed to allow the safe anchoring of vessels undertaking pipelay, dredging and piledriving activities in the vicinity of any nearshore heritage or sacred sites.	Not applicable to current audit.		NA
28.08	Monitoring will be undertaken for Aboriginal heritage sites. This will involve inspections by Larrakia representatives prior to and during the construction phase and during the commissioning and operations phases. Photographic records will be maintained for each of the sites.	Assessed in previous audits		NA
28.09	To minimise disturbance, a 100-m-radius controlled zone will be established around all known Catalina flying-boat wrecks.	Not applicable to current audit.		NA
28.1	To minimise disturbance, a 100-m-radius controlled zone for the wreck of the SS Ellengowan will apply (based on the intersection of latitude 12°32'16.3"S and longitude 130°52'06.3"E on the Port of Darwin 1:50 000 map sheet AUS 26).	Not applicable to current audit.		NA
28.11	To minimise disturbance, a 100-m-radius controlled zone for the wreck of the coal hulk Kelat will apply (based on the intersection of the lines of latitude 12°29'55.4"S and longitude 130°52'40.2"E on the Port of Darwin 1:50 000 map sheet AUS 26).	Not applicable to current audit.		NA
28.12	Accurate differential GPS (dGPS) locations of all wrecks near the nearshore development area will be obtained prior to the commencement of construction.	Not applicable to current audit.		NA
28.14	During the construction and operations phases, INPEX will periodically assess sediment conditions of Catalina wrecks near to the shipping channel and in consultation with DLPE (formerly NRETAS) determine whether any remedial action is required to address impacts should they arise.	Not applicable to current audit.		NA
28.15	The World War II historical sites located on Bladin Point are not listed and do not require approval to disturb; however INPEX will consult with the Heritage Branch of NT EPA (formerly NRETAS) before disturbing the sites, and all sites will be surveyed and recorded.	Not applicable to current audit.		NA
28.16	INPEX has made alterations to the onshore design to avoid disturbance of known heritage sites within the pipeline corridor and combined operations complex; INPEX has agreed to increase the distance for flagging and fencing of Aboriginal heritage sites to 50 m, or to the greatest extent possible where 50 m may not be possible.	Assessed in previous audits		NA
29	Airborne Noise			
29.02	Blasting operations will only be undertaken during daylight hours and adequate notice will be provided to communities which could be affected by the sound or activities (e.g. Darwin Harbour users, the City of Palmerston and the Darwin Liquefied Natural gas plant at Wickham Point).	Not applicable to the current audit		NA
29.04	Piledriving activities are planned to be undertaken during daylight hours only. Night-time piledriving would only be required if Project construction activities were to fall significantly behind schedule.	Not applicable to the current audit		NA
29.05	Buses will be utilised for transporting the majority of workers to and from site to reduce the total number of vehicles on the roads and therefore noise emissions.	Buses were witnessed being utilised during the site visit.		A
30	Visual Amenity			
30.01	The lighting design for the onshore and nearshore infrastructure will be selected with consideration of the visual impact to the community while meeting personnel safety requirements.			NA
30.04	Dust suppression techniques will be employed where necessary to protect vegetation health, worker health and amenity. This may include spraying from water trucks or irrigation; it may also include stabilisation and revegetation of cleared areas that are no longer needed as soon as practicable during the construction phase.	Dust suppression trucks and road stabilisation witnessed during site visit.		A
32	Public Safety			
32.04	Public access to the onshore development area will be restricted during construction.	Security onsite and passes required for site access.		A
36	Additional Commitments made in the EIS Supplement			
36.01	The cetacean management plan will be extended to include dugongs. Also key management controls reconfirmed in SEIS: management measures to be employed through the cetacean management plan: Vessel masters to be trained in cetacean interaction procedures; vessels will be operated at "no wash" speed when within 50–150m of a dolphin and will not intentionally approach a dolphin.	Not applicable to current audit.		NA

ID No.	Environmental commitment/condition	Comments/ Compliance Evidence	Findings	A/O/N/C N/A
37	NT EPA (formerly NRETAS) recommendations			
37.01	Recommendation 1 The proponent shall ensure that the proposal is implemented in accordance with the environmental commitments and safeguards: • Identified in the Ichthys Gas Field Development Project's Environmental Impact Statement (draft EIS and Supplement); and • Recommended in this Assessment Report. All safeguards and mitigation measures outlined in the Environmental Impact Statement are considered commitments by INPEX Browse Ltd and its joint venture partners.	Not assessed during current audit.		NA
37.02	Recommendation 2 The proponent shall advise the Minister of any changes to the proposal in accordance with clause 14A of the Environmental Assessment Administrative Procedures, for determination of whether or not further assessment is required.	Not assessed during current audit.		NA
37.16	Recommendation 10 Relevant EMPs are to be amended to include measures for minimising vessel interactions / collisions with dolphins, turtles, dugongs and other large marine fauna. The relevant plans should include: • details on procedures to reduce the risk of vessel strikes on large marine vertebrates (marine turtles, dugongs and cetaceans) such as speed limits • requirements for installation of propeller guards on vessels associated with the Project • details on procedures for monitoring and reporting of vessel strikes on large marine vertebrates • plans to monitor for stranded, injured or dead large marine vertebrates.	Not assessed during current audit.		NA
37.27	Recommendation 15 Appropriate controls to mitigate risks from hydrotesting waste water must be included in the Liquid Discharges, Surface Water Runoff and Drainage Management Plan for Government approval. In preparing the plan, INPEX should also: • Investigate options for land-based disposal where practicable; and • Select chemical additives that have the lowest practicable risk to the marine environment.	Not assessed during current audit.		NA
37.28	Further investigation of land-based disposal is needed to clearly demonstrate that this is not a viable option for all Project waste water, in 'Dry' season conditions.	Not assessed during current audit.		NA
37.29	INPEX needs to explore further the potential for re-use of treated water in the process, which would potentially reduce reticulated water demand as well as discharge volumes.	Not assessed during current audit.		NA
37.3	Discharges to the Harbour would be required to meet Water Quality Objectives for the Darwin Harbour Region.	Not assessed during current audit.		NA
37.31	All discharges to the Harbour require monitoring for a period prior to commencement of discharge to establish baseline data for determining impact of the discharge; validation of mixing zones where applicable (i.e. where water quality objectives can not be met); monitoring during the life of the activity; and during remediation of the site on cessation of the activity.	Not assessed during current audit.		NA
37.41	Recommendation 21 The Bladin Point gas facility must incorporate best-practice water conservation measures into the design. The proponent must commit to continuous improvement in minimising potable water use.	Not assessed during current audit.		NA
37.44	Recommendation 23 All Environment Management Plans for the Ichthys Gas Field Development Project are to be submitted to Government for approval prior to commencement of any works for which the plans apply. In preparing each plan, the proponent will include any additional measures for environmental protection and monitoring contained in this Assessment Report and Recommendations. The plans shall be referred to relevant Northern Territory Government agencies and key stakeholders for review prior to finalisation. The plans shall form the basis for approvals and licences issued under relevant legislation. The proponent should provide public access to final environmental management plans and a reporting mechanism to inform compliance with the plans.	Not assessed during current audit.		NA

TABLE 2-3 CEMP
AUDITOR EVIDENCE TABLES - 18-22 APRIL 2016



Number	Mitigation measure	Comments/ Compliance Evidence	Findings	A/O/N/C/ N/A
CEMP Table 6.4.8 Surface Water Mitigation Measures				
	INDUCTIONS AND TRAINING			N/A
	SURFACE-WATER DRAINAGE			
6.4.03	All stormwater discharge will be in accordance with the approved ESCP. Discharge of untreated stormwater is only permitted when the storm event exceeds the design criteria of the sediment basins and other controls in accordance with the IECA 2008 Guidelines. Contractor shall ensure that Subcontractors are issued with the latest revision of all relevant documents.	Refer to Mitigation Measure 6.5.05 Dewatering Permit -000788 date 21/03/2016 sighted during audit.	Refer to erosion and sediment control components. No non-compliances identified.	A
	SURFACE-WATER CONTAMINATION			
6.4.06	All stormwater runoff from controlled sediment basins (for storm events within sediment basin design specifications) or equivalent control (IECA 2008) and all construction water to be discharged off Site will be by the Contractor Dewatering Permit process. Contractor approval will be obtained prior to each discharge.	Dewatering Permit -000788 date 21/03/2016 sighted during audit. Dewatering Permit -000880 date 11/04/2016 sighted during audit. Full list of dewatering permits provided.	Comment: Mangrove basin is used a great deal for discharge of water from dewatering of excavations/trenches. Numerous discharge water permits sighted for discharges of stormwater from excavations to the regulating drain or the flare pad basin. All discharges of construction water off-site appeared to have appropriate permits.	A
	HYDROTESTING			
6.4.15	A Hydrotest Environmental Management Plan and supporting documentation will be developed prior to precommissioning for approval by Company. All spent hydrotest water discharge will comply with the conditions of WDL 211, and reuse will comply with criteria in Table 6.4.6. Investigation, sampling and reporting is to be completed as per Measure 6.4.46.	Hydrotest Environmental Management Plan - L290-AZH-PLN-0023. 16 April 2015. Approved by Company 19 Nov 2015.	Sighted Hydrotest Environmental Management Plan, Rev 0. Rev E approved by company 19 November 2015.	A
6.4.16	Equipment shall be cleaned as necessary prior to hydrotesting to remove dust, dirt, mill scale, rust, debris, preservatives, fabrication chemicals/coatings/residues to minimise the potential for contamination of hydrotest water. Methods will include sweeping and wiping, water washing, air blowing, pigging or similar. Water used in the cleaning process will be reused, discharged, or disposed of depending on the water quality in accordance with Table 6.4.5 and Table 6.4.6. For surface-water mitigation measures relating to waste management, refer to Section 6.12 Waste management.	Monadelphous - Safe Work Method Statement. SWMS 048 rev 10 signed.pdf.date 09.02.16 sighted during audit.	GEP pipe was pigged prior to hydrotesting.	A
6.4.17	In order to minimise the volume of potable water used and to minimise the volume of potentially contaminated water, spent hydrotest water will be transferred between equipment i.e. pipeline sections, vessels and tanks and reused for multiple pre-cleaning, flushing and hydrotesting activities to the largest extent practicable Hydrotesting of process modules will be undertaken where possible at fabrication yards prior to shipping to Site to minimise the volume of potable water required on site and production of spent hydrotest water generated on site.	L 290 - AQ - MDR - 10785. MANUFACTURERS DATA RECORD (MDR) FOR MODULE A2ED – MODULE FABRICATOR (STP&I) Dated 10-MAR-2016	TNK 2 - Hydrotest water was transferred between tanks. Tank 2 to Tank 1 to the buffer tank.	A
6.4.19	All water used for hydrotesting shall be potable water supplied to Site by PWC i.e. no other water type shall be used for hydrotesting. The water quality of potable water entering the Site has been monitored regularly and these data have been used to define the supplied potable water quality	GreenCap report, Monthly Bladin Point and Accommodation Village Potable monitoring report Feb 2016 - Environmental Impact Monitoring Program - L290 - AH - REP - 10630 dated 07/04/16	Potable water supply monitored monthly for total metals by Greencap at the mains location at front of site. Trending of copper results since March 2014, with high variability since Jan 2015. Potable water sampling results presented at the time of audit were for total metals only (not filtered). Field filtered metals samples are recommended for improved understanding of dissolved (filtered) copper concentrations.	O
6.4.21	All cleaning and flushing solutions and solid and semi-solid waste shall be appropriately contained and managed as per Section 6.12 Waste management. Solid and semi-solid waste will be disposed offsite at a licenced waste facility.	Monadelphous - Safe Work Method Statement. SWMS 048 rev 10 signed.pdf.date 09.02.16. CB&I Tank 2 contractor. Hydrostatic Test Procedure for field - non cryogenic Tanks - L290- AQ_ PRC - 10772 - 10/03/2016. Email correspondence to sub contractors. Krescho Zic. Waste classification of Fire water tank residual sediment, dated 8/04/2016.	Buffer tank solids will be settle and will be sampled but not undertaken at this time. Procedure for TNK 2 contractor (sec 6.7) outlines process for sampling and disposing of sludge.	A
6.4.22	In order to minimise impacts associated with the discharge of contaminated spent hydrotest water, no chemicals will be added to or used in pre-cleaning, flushing or hydrotest water (with the exception of those basic approved chemicals as defined in Table 6.4.7) to be discharged from Site.	Chemicals (sodium bicarbonate, Calcium chloride) sighted during Tank-2 walkover for water 'softening' all on approved list during audit.	Observed chemicals on-site at Tank 2 were consistent with Table 6.4.7.	A
6.4.23	Methods for dewatering will avoid or minimise the risk of contamination of hydrotest water. Methods will include use of pressurised air or inert gas, gravity, pumping or vacuum or similar.	CBI Safe work method Statement 032 - hydrostatic testing - dated 28/02/2016. De-watering Pump (self priming) Checklist dated 4-1-16.	Draining of the tanks by gravity.	A
6.4.24	Dewatering will follow the Contractor permitted process and will only be commenced once Subcontractor has obtained a Dewatering Permit in accordance with the Water Discharge Procedure (L290-AB-PRC-10265).	Hydrotest discharge Permit - 000811 - date18/04/2014 JKC - Condensate Tanks Water Filling - Water Analysis.exl included with permit. Record of discharge from Condensate Tank 1 - Discharge from Condensate Tank 1 (TNK - 2 Sub contractor) 19/04/2016.	TNK 2 Hydrotest water (approximately 56,100 m3) to outfall WDL 211. Permit raised. Permit issued on basis of subcontractor tests 100% fill on 15 March and permit issued on 29 March 10:00am. Subcontractor tested hydrotest water on 29 March at commencement of discharge (post issue of permit) and discovered concentrations not consistent with the permit. Discharges ceased on 1 April 2016 at 12:00 pm following receipt of the sample results. This finding is an 'A' because the discharge permit was issued prior to discharge and was followed. The inconsistency in the data collection for the permit is addressed in 6.4.42.	A
6.4.25	Communication will be maintained between pump/dewatering operators and observers of hydrotest equipment and dewatering pipework routes to report any problems.	CBI Safe work method Statement 032 - hydrostatic testing - dated 28/02/2016. De-watering Pump (self priming) Checklist dated 4-1-16.	Appropriate communication requirements are included in the method statement and checklist.	A

TABLE 2-3 CEMP
AUDITOR EVIDENCE TABLES - 18-22 APRIL 2016



Number	Mitigation measure	Comments/ Compliance Evidence	Findings	A/O/N/C/ N/A
6.4.26	Records of potable water use and spent hydrotest water generated will be maintained on site and provided to Contractor, including as part of the hydrotest Water Discharge Procedure and dewatering permit application. Records will be made available to Company upon request.	Tank L-430-T-001 Water Discharge Readings 02 April KZ review rev B. exl spreadsheet of potable water use. Volumes of emptying of Condensate Tank No 1 & fill of Buffer tank. Dated 19/04/2016 MEC 1 Hydrotest Sampling v35 (1) 16/04/2016. exl spreadsheet.	Sighted graphs of water use and spent hydrotest water across tanks. MEC-1 water use data provided in spreadsheets.	A
6.4.27	The reuse of spent hydrotest water onsite for dust suppression will comply with NT DoH's relevant requirements based on risk assessment including, but not necessarily limited to: • there will be no surface runoff or ponding of reused water • using spray drift controls as required • adhering to minimum buffer distances as required • compliance with AS/NZS 3500.1 as required	Interview of MEC-2 contractor indicated that some hydrotest water had been reused on-site.	No hydrotest water was being reused at the time of the audit to visually confirm these requirements specifically for hydrotest water.	NA
6.4.28	All spent hydrotest water to be reused onsite will be managed by the Contractor permitted process. Contractor approval will be obtained prior to each reuse via the hydrotest Water Discharge Procedure (Water Discharge Procedure L290-AB-PRC-10265).	JKC - Draft hydrotest Sampling Results 081015 .pdf - dated 081015.	MEC-2 hydrotest water being reused on-site - 50,000L of hydrotest water from carbon steel pipe was reused on-site. A full suite of samples to assess against reuse criteria in Appendix E of the procedure was not undertaken in accordance with Table 7.1 of the procedure on that basis of a preceding characterisation study had been completed in accordance with section 7.3.2. The characterisation study of MEC-2 pipework was undertaken in August 2015 which indicated that TRH was present in Hydrotest water. the characterisation study demonstrated that changes in lube application could result in reduction of TRH results in hydrotest water. Despite the detection of TRH in the characterisation study, no further TRH testing was undertaken of the hydrotest water prior to reuse. The procedure is silent on actions to be taken if the characterisation study identifies compounds exceeding criteria and how verification in any change in process is to be validated post characterisation. It is the auditor's opinion that additional periodic TRH tests should have been required as part of the discharge permit process to verify that the changes in lube method were being implemented consistently. It is recommended that the procedure be updated to provide more clarity for such	O
6.4.29	Discharge of spent hydrotest water from Site to Darwin Harbour is subject to the issue of a Waste Discharge Licence (WDL) and compliance with all the conditions imposed.	Hydrotest discharge Permit - 000811 - date 18/04/2014	TNK-2 subcontractor is the only subcontractor to have discharged hydrotest water under WDL 211. Sighted MGT - Eurofins lab certificates attached to permit for discharge. At the time the permit was issued all testing was in compliance with the WDL211 and discharge commenced. During discharge a subcontractor sample returned a result that was not compliant with discharge permit limits and discharge ceased. Subsequent sampling by Contractor demonstrated that the subcontractor result was anomalous and that water was compliant with permit conditions and discharge recommended.	A
6.4.30	Hydrodynamic modelling will be undertaken once for worst case scenario discharge of spent hydrotest water to Darwin Harbour to establish the dispersion/dilution characteristics.	L290 - AH - REP 10695 - Discharge of spent hydrotest water via temporary ocean outfall modelling report. Dated 30 June 2015	Sighted hydrodynamic modelling report dated 30 June 2015. Included in WDL licence application.	A
6.4.31	All spent hydrotest water to be discharged off Site will be managed by the Contractor permitted dewatering process. Contractor approval will be obtained prior to each discharge via the Dewatering Permit.	Hydrotest discharge Permit - 000811 - date 18/04/2014	As per above.	A
6.4.32	Spent hydrotest water that does not comply with the WDL and discharge water quality criteria will be a) treated on Site prior to reuse or discharge or b) disposed offsite. Any required treatment will avoid the addition of chemicals to hydrotest water where possible (with the exception of those "basic approved chemicals"). In the event treatment requires the use of chemicals, the treatment will be effective in removal of those chemicals as well as any reaction or breakdown products as necessary to acceptable levels to comply with applicable discharge water quality criteria. The selection and management of chemicals will follow the Contractor approval process and requirements in the CEMP. The effectiveness of any treatment undertaken will be verified by monitoring to demonstrate compliance with applicable water quality criteria prior to discharge.	No remedial treatment has been required to date to ensure hydrotest water meets discharge water quality criteria.	No remedial treatment has been required to date to ensure hydrotest water meets discharge water quality criteria. The one time discharge ceased due to exceedance of limits it was attributable to a laboratory testing issue.	NA
6.4.33	Off-specification or contaminated spent hydrotest water including chemically treated (with the exception of approved surface water treatment chemicals) water will be disposed of offsite at a waste facility licensed to receive that type of waste. Handling, storage and transport will be undertaken by appropriately trained personnel. Disposal offsite will be via a licenced waste contractor to a suitably licenced facility.	Occurred during Audit period, taken offsite as contaminated water. Waste Transport certificates provided along with disposal/treatment location invoices. Transpacific Tax Invoice 215LSN001, 1944414 dated 16/12/2015. Transpacific waste transport cert. 1944414. 15/12/15 Veolia waste tracking register. Alternative Waste Providers Listed Tracking Register.	CCPP hydrotest water - suspected of having off-spec hydrotest water due to potential hydrocarbon contamination. Waste water taken off-site.	A
6.4.34	Leachate/soak testing will be conducted as necessary prior to hydrotesting of internally coated equipment i.e. with internal surface treatments, coatings, preservatives, films, linings applied to determine likely water quality of hydrotest water prior to discharge. Soak testing will also confirm the corrosion risk under hydrotesting conditions and the ability to avoid the use of chemicals in hydrotest water by minimising the time the water remains in the equipment.	Site instruction to TNK-2 Contractor from JKC. Site Instruction Number. P-31D5- Tank 2- SI- 0012 dated 27 March 2015. L290 - AH - LIC -10005 Hydrotest Discharge: Waste Discharge Licence Application - Supporting Documentation - 01 July 2015	TNK2 issued an site instruction to undertake soak tests on 27 Mar 2015. Condensate tank soak testing, GEP, FGP undertaken early 2015 and incorporated in licence application.	A
6.4.35	Chemicals/products (except those basic approved chemicals listed in Table 6.4.7 and those used for water flocculation or pH correction as described in the Water Discharge Procedure (L290-AB-PRC-10265)) are not required or permitted for use in hydrotest water (pre-cleaning, flushing and hydrotesting) that is proposed to be discharged from the site. Any approval of a chemical/product will be subject to the approval process detailed in the Hazardous chemicals, substances and materials procedure (L290-AH-PRC-0014) including an environmental risk based assessment to determine the suitability of the product.	Hasn't occurred onsite as yet.	Sighted chemical on-site at TNK-2 subcontractor area.	A

TABLE 2-3 CEMP
AUDITOR EVIDENCE TABLES - 18-22 APRIL 2016



Number	Mitigation measure	Comments/ Compliance Evidence	Findings	A/O/N/C/ N/A
6.4.36	A permit to commence hydrotesting activities is to be obtained via the permit to work process prior to filling. The permit to work process will include identification of hydrotest activities. The permit will initiate use of the hydrotesting Water Discharge Procedure (Water Discharge Procedure L290-AB-PRC-10265).	L290 - AH - LIC -10005 Hydrotest Discharge: Waste Discharge Licence Application - Supporting Documentation - 01 July 2015		A
	OPERATION OF MOFTP			
6.4.37	During MOFTP operations, the following will be observed: • Ballasting movements are to be conducted in a slow and steady manner. Ballasting calculations will be prepared to determine the amount of ballast water intake and discharge • Ballast outlets are parallel to the seabed minimising risk of ballast discharge generating turbidity plumes • Avoid operating at the high end of the ballast discharge rate, where possible to minimise generation of turbid plumes • Routine inspections of ballast tanks will be conducted • Wastewater tanks and fuel storage areas to be regularly inspected for evidence of leaks or spills • No washdown is to occur on deck, without suitable containment first being in place. Washdown water is not permitted to discharge to the marine environment • Deck debris is to be swept up and loaded to approved containers. Good housekeeping practices will apply For surface-water mitigation measures relating to management of on board waste storage facilities	Dangerous Goods and Hazardous Goods Inspection. 010030. dated 07/03/2016.	MOF Audits - TRB-1 (ALE). Inspection of hazardous goods 7 March 2016 indicates fuel storage was acceptable.	A
	OPERATION OF TEMPORARY SEWAGE TREATMENT PLANT			
6.4.38	The temporary STP, and associated pumping stations, will be operated and maintained, including required monitoring, recording and reporting, with regard to any conditions associated with the Approval to Operate a Recycled Water System issued by the Department of Health and the WDL.	Waste Water treatment plant Master Tracker W bod.exl Dated 1/01/2016 - 14/04/2016. Waste Water treatment plant Master Tracker W bod.exl Dated 16/03/2015 - 31/12/2016.	Sighted observation tracking spreadsheets 16 March to 31 Dec 2015 and 1 Jan 2016 to 14 April 2016. Flow monitoring daily. Monitoring being done by Greencap. Sighted report to NT EPA dated 8 April 2016 which highlighted a number of non compliances with water quality objectives specified in Condition 13 of WDL192 in September 2015, January 2016, March 2016 (included discussion technical exceedances against WDL). The delay in reporting is considered a non-conformance against Condition 19 of WDL192 requiring notification of non-compliances within 24 hours to NT EPA.	N
	MONITORING AND INSPECTIONS			
6.4.39	Compliance monitoring of the temporary STP at the effluent tank outlet, regulatory mixing zone and reference sites will be conducted in accordance with the conditions of WDL 192. Monitoring of receiving surface-water quality will be expanded by an additional four monitoring locations, to determine if receiving water is being adversely impacted by discharge of the treated effluent. Compliance monitoring as proposed by Contractor is included in the WDL 192.	2 WDL192_TARP Report_060416.exl dated 06.04.2016 Email notification to EPA of WDL exceedances from Emma Gulliver to Jane Orr 8/04/2016. WDL192-1: Notification of Non Compliance.	Monitoring report sighted demonstrating WDL monitoring compliance.	A
6.4.40	During hydrotesting activities, water quality monitoring requirements will apply during filling which will provide advance warning of any actual or potential exceedance of water quality criteria per Water Discharge Procedure. Compliance monitoring of the discharge of spent hydrotest water will be conducted in accordance with the conditions of WDL.	Hydrotest discharge Permit - 000811 - date18/04/2014	TNK 2 data provided 25%, 50%, 75% and 100% tests.	A
6.4.41	All construction water will be monitored prior to discharge off Site to confirm compliance with the water quality criteria in Table 6.4.4. Where there is potential for construction water to be contaminated with hydrocarbons or metals, water will require testing for hydrocarbons and metals in accordance with Table 6.4.5 and the Water Discharge Procedure, prior to discharge. Construction waters are to be handled and managed in accordance with the Water Discharge Procedure. • Runoff actively discharged from a controlled sediment basin must comply with Table 6.4.4. The discharge water quality criteria in Table 6.4.4 do not apply to the overflow discharge from a controlled sediment basin where the design rainfall specification is exceeded (deemed 'stormwater runoff'), where the basin has been designed, implemented and operated in accordance with IECA (2008). • Runoff and water accumulated in equipment bunds must comply with the water quality criteria shown in Table 6.4.4. Where there is potential or suspected contamination with hydrocarbons, chemicals or contaminants the water will be tested for relevant parameters from Table 6.4.5 prior to reuse, discharge or disposal, in consultation with Contractor. • Water that intercepts acid sulfate soils and is required to be discharged must comply with the water quality criteria shown in Table 6.4.4. Where pH testing indicates a pH level below 6, this will trigger further laboratory testing for metals in accordance with Table 6.4.5. • Groundwater that has collected in excavations or trenches, which is proposed to be discharged will be sampled and assessed against Table 6.4.5. If compliant, discharge may be undertaken. If not suitable for discharge, the groundwater shall be treated and reused on site once compliant with Table 6.4.6, or sent offsite for disposal with a licensed contractor. • Wastewater generated by washdown facilities and from concrete batch plants and other areas for production of cementitious materials will not be discharged from Site.	Surface Water Dewatering Permit -000971 date 20/042016 sighted during audit. No groundwater discharge offsite. Surface Water Dewatering Permit -000507 date 03/02/2016 sighted during audit. Permit 507 is for water discharge from the Hazardous Materials / Waste area to quarantine pad. Surface Water Dewatering Permit -000467 date 11/02/2016 sighted during audit for water discharged from Haz Goods storage/haz waste pad to the oil water separator.	Tables 6.4.3 and 6.4.4 requires the permit authoriser to consider if stormwater is potentially contaminated. Where there is potential for contamination then the permit is to require additional testing. Based on the auditor's review of the permit system this contamination test appears to have been distilled down to a visual check for hydrocarbon sheen. The structure of the permit does not encourage the questions about the potential for other contamination to exist (e.g. dissolved phase metals) and thus the permit assumes the water is not contaminated if no sheen is present. The initial risk assessment in the permit should place the onus of proof on the person raising the permit to satisfy the authoriser that there is minimal risk of pollution. Two examples of the failure of the permit system to identify potential contamination are in permits 507 and 467. Permit 507 is for discharge of water from a hazardous goods area to the quarantine pad with only a visual inspection for sheen. JKC provided annotations to this permit in the audit stating that it was not a hazardous goods area and it was the quarantine pad being used as a laydown area. The risk assessment that was included in the annotations is not included in the permit itself and therefore there is no way for the auditor to verify this permit. Permit 467 is another example where water that had accumulated in the hazardous goods store and hazardous waste storage area was discharged by oil water separator to a sedimentation pond. A visual inspection for sheen was performed however no testing of other potential pollutants was conducted despite the hazardous waste area being used for storage of chemicals and corrosive MEC-2 hydrotest water being reused on-site - 50,000L of hydrotest water from carbon steel pipe. Hydrotest water reused on-site. Sampling not undertaken in accordance with Table 7.1. Characterisation study MEC-2 in August 2015 indicate that TRH is present in Hydrotest water. Changes in lube application resulted in reduction of TRH results in hydrotest water. Subsequent permits did not require TRH testing so cannot confirm that TRH results meet reuse criteria.	N
6.4.42	Spent hydrotest water will be monitored to confirm compliance with the applicable water quality criteria in Table 6.4.6 prior to reuse.		MEC-2 hydrotest water being reused on-site - 50,000L of hydrotest water from carbon steel pipe. Hydrotest water reused on-site. Sampling not undertaken in accordance with Table 7.1. Characterisation study MEC-2 in August 2015 indicate that TRH is present in Hydrotest water. Changes in lube application resulted in reduction of TRH results in hydrotest water. Subsequent permits did not require TRH testing so cannot confirm that TRH results meet reuse criteria.	N
6.4.43	Spent hydrotest water will be monitored to confirm compliance with WDL 211 conditions prior to discharge..	Hydrotest discharge Permit - 000811 - date18/04/2014	Subcontractor tested hydrotest water on 29 March at commencement of discharge and discovered concentrations not compliant with WDL211.	A
6.4.45	Water-quality sampling will be performed by a suitably qualified environmental or water-quality professional. Sampling including collection, preservation, handling, storage and transportation will be carried out in consideration of the relevant Australian standard(s). Monitoring of parameters in situ will be conducted using calibrated hand-held monitoring devices. Monitoring devices will be calibrated at the frequency recommended by the manufacturer, taking into consideration how often the device is used i.e. daily, weekly, fortnightly). Calibration records shall be maintained on site and made available to Contractor upon request. All laboratory analyses of water samples will be undertaken by a NATA-accredited laboratory, or equivalent. NATA-certified methods will be used where available.	Meek 2 - Water quality calibration register 2016.04.11 .	MEC-2 all hydrotesting done on-site by field staff. Sighted calibration records for MEC-2 for turbidity, pH and TDS, chlorine. Testing done monthly. NATA lab certificates sighted for Tank 1 hydrotest but no evidence was provided to demonstrate the level of competency of the subcontractor taking the critical compliance tests.	N

Number	Mitigation measure	Comments/ Compliance Evidence	Findings	A/O/N/C/ N/A
6.4.46	In the event that exceedances of surface water monitoring criteria and/or WDL criteria are detected, the steps below will be followed to determine whether the change detected during the monitoring is related to Project activities, and further investigation or incident reporting is required. The stepwise process concludes if there is no correlation able to be made between the activity, results or impacts measured in the receiving environment: 1. Document comparison of sampling results with relevant receiving environment criteria from Table 6.4.5 or associated WDL criteria and conditions. Proceed to next step. 2. Review records of recent liquid discharges from site including from dewatering events, hydrotest discharges, wastewater discharge and significant storm events. Proceed to next step. 3. Undertake EIMP spatial impact assessment involving comparison of the impact site sample against the reference, upstream and downstream samples using Table 6.4.5 to determine whether result is potentially attributable to liquid discharges from the site. Where the exceedances in the downstream samples may be attributable, proceed to next step. 4. Undertake 80th percentile evaluation, or where 80 percentile cannot be calculated then compare to trigger value $\pm 10\%$. Where the receiving environment median exceeds 10% above the reference 80th percentile dataset and is potentially attributable to a liquid discharge, this would initiate the incident reporting process. Proceed to next step. 5. Conduct incident investigation and determine the event category, immediate and temporary controls, sequence of events, contributing factors and root causes. Undertake appropriate corrective and preventative action (may include actions such as temporarily stopping or restricting dewatering permits, stopping use of water treatment chemicals and flocculants, review of current discharge practices and procedures, review of erosion and sediment controls and ESCP). Proceed to next step. 6. Compare against next quarterly round of EIMP surface water, mangrove, sediment and bio indicator monitoring results. Define if there is an ongoing correlation between the discharge event and impacts to the receiving environment, incorporating the spatial impact assessment. Provide management recommendations.	WDL 192-1 , Notification of non compliance from JKC (Emma Gulliver) to NT EPA (Jane Orr) - 08/04/2016	Exceedances of WDL 192. Undertaking investigation into WDL exceedances - DO, NOx, Ammonia and TP. Sighted in email to NT EPA.	A
CEMP Table 6.5.3 - Erosion and Sediment Control Mitigation Measures				
INDUCTIONS AND TRAINING				
6.5.01	Site inductions will include the following specific components for erosion and sediment control: • description of the mechanism by which erosion and sedimentation occur, and the associated environmental impacts • the use of erosion and sediment control devices to mitigate impacts, and ideal operation of these devices • the requirement for erosion and sediment control devices to be implemented and maintained in accordance with the ESCP.	JKC Erosion Sediment Control Attendance Sheet - ECS TOOLBOX - 24th of August 2015 sighted. Mandatory with all JKC staff and contractors. JKC Email (Holly Durant) dated August 26 2015. Update to environmental induction slides. Erosion sediment control. INPEX attendance sheet and slide deck of toolbox undertaken. 24/08/15 - Erosion and sediment control toolbox - evidence Induction - construction staff to not remove controls - slides TBP to ensure that they have been incorporated.	INPEX Site Wet Season Management Principles Slide Deck provided inclusive of specific components in mitigation measure.	A
6.5.02	Erosion and sediment control toolboxes will be implemented across site as relevant and required in regards to the works being undertaken.	JKC Erosion Sediment Control Attendance Sheet - ECS TOOLBOX - 24th of August 2015 sighted. Mandatory with all JKC staff and contractors. I290-ah-pln-10204	ESC Tool box - 24 August, 2015 - mandatory toolbox for JKC and INPEX staff. Evidence of Erosion and Sediment Control Toolboxes being undertaken was provided.	A
PLANNING AND DESIGN				
6.5.03	Design of erosion and sediment control features must comply with IECA (2008) guidelines including providing erosion risk assessments and designing control features commensurate to the risks.	Erosion sediment control plan - L290-AH-PLN-10204 updated rev 5 sent to August 31 st. Changes to type 3 controls made 09 Sep. 01 Mar final update. CDM Smith (CPESC). NT EPA acceptance letter provided to JKC/Company.	Erosion and sediment control plan updated in 31 Aug (Rev5) send to EPA, 9 Sept 15 changes to Type 3 controls. CDM Smith was CPESC on these drawings. Appendix B - RUSLE Calculations provide the erosion risk assessment and feed into the design of the controls that are to be implemented on the ground. Erosion risk assessment developed by CDM Smith CPESC and then third party reviewed by CPESC	A
6.5.04	Contractor will develop a master ESCP to document the erosion and sediment controls for the whole site. Contractor ESCP will provide an overarching plan and incorporates ESCPs from Subcontractors for their individual work packages and areas. Contractor ESCP will be endorsed by CPESC, approved by Contractor and Company and accepted by DLPE and DLRM/NT EPA prior to commencement of wet season works.	Erosion sediment control plan - L290-AH-PLN-10204 (Mar 01). Sighted during audit. CDM Smith (CPESC). Sign off. JKC 2015-2016 Wet Season Erosion and Sediment Control Plan Rev1.pdf Prepared by CDM Smith in consultation with JKC. Provided prior to wet season to EPA - 31 August 2015 - no comments, 3rd party review by O2. Sub-contractor created ESCP, delivered to JKC, CDM smith then incorporated into an overall plan and submitted to the EPA prior to the wet season. Accepted by the EPA.	Subcontractor prepared CPESC plans which was collated into one plan. All items required in this mitigation measure were undertaken.	A

TABLE 2-3 CEMP
AUDITOR EVIDENCE TABLES - 18-22 APRIL 2016



Number	Mitigation measure	Comments/ Compliance Evidence	Findings	A/O/N/C/ N/A
6.5.05	ESCPs shall be prepared by each Subcontractor conducting construction activities where there are risks of erosion and sediment runoff, to manage and minimise the risks. Each ESCP will be endorsed by a Certified Professional Erosion and Sediment Control (CPESC) and approved by the Project Environmental Manager. These shall be updated regularly to reflect progressive work phases and potential risk changes. All ESCP updates are to be re-endorsed by the CPESC. Each Subcontractor ESCP must: • be fully compliant with IECA (2008) guidelines; • detail Subcontractor environmental controls for the upcoming wet season that incorporates the proposed stages of works against the erosion hazard risk assessment • address the management of surface water runoff • identify key construction stages that may require changes/updates to the plan. • include a timeframe for implementation of the plan • include a list of personnel responsible for implementation of the ESCP and management of surface water runoff discharge and obtaining discharge permits including managers, supervisors, labourers • include training records and statement of experience in erosion and sediment control or surface water management for the identified personnel responsible for implementation of the ESCP • contain the planned or anticipated products or materials required to manage surface water including items such as soil stabilisers and flocculants, number and size of pumps and water treatment units, and other water management products/materials/equipment; and the timing for procuring these materials/equipment and their arrival on site. • detail the plant and equipment required to implement the ESCP both for construction and operation maintenance of the nominated ESCs including excavators, spray carts, water carts; and the timing for procuring these plant/equipment and their arrival on site.	JKC 2015-2016 Wet Season Erosion and Sediment Control Plan Rev1.pdf CDM Smith - inspection on the 17-19 September Letter (with follow up items) CDM Smith - verification letter - 1 October CDM Smith - 28-29 October - compliance inspection CDM Smith 20-21 January inspection - 26 February 2016 Site inspection of BLD-1 with CPB contractor (environmental site representative) BLD1 - Progressive ESCP 2015/16 Wet Season Onshore gas export pipeline works GEP 1 Primary Erosion and Sediment Control construction drawings JKC weekly inspections	Comparison of the GEP pipeline prepared by the subcontractor and that prepared by the contractor Certified Professional in Erosion and Sediment Control (CPESC) matched the BLD1 - ESCP (Erosion and Sediment Control Plan) listed controls that were installed on the ground. Site inspection undertaken by auditor assistant Tim Haydon (CPESC). Evidence of controls outlined in plans were confirmed by observations in comparison to controls outlined in CPESCs. This comparison was undertaken using the overarching JKC wet season ESCP in numerous locations and at BLD-1 using the subcontractor CBP's ESCP. Preparation of ESCPs and numerous reviews by CPESCs throughout the process demonstrates compliance with the IECA guidelines. The JKC CPESC was designed to be (and evidently was) implemented prior to the wet season. Regular inspections by the CPESC (CDM Smith) identified where controls required improvements and where construction activities had changed such that controls required maintenance or alteration. Weekly inspections identified timeframe and priority for repair/maintenance of controls.	A
6.5.06	During the wet season, erosion and sediment controls will remain in place until the area is stabilised or equivalent ESC measures are implemented consistent with the IECA guidelines and ESCP. During the dry season, erosion and sediment controls may be temporarily removed, but must be reinstated prior to the following wet season and prior to forecast rain during the dry season.	Section 6.2.9 of ESC plan - change management. Field Inspection and email by JKC Environmental Manager. Email correspondence: E300/400 open drain weep holes between CVL 7 and JKC dated 22 March 2016 sighted. Shows planned works and accepted work plan from JKC. Email correspondence. 22 March. Thomas Giltrap (JKC) TNK-1. Sedimentation Pond to be backfilled for A1BB. sighted during audit. CDM Smith 20-21 January inspection - 26 February 2016 email - E300 Weep holes (example of removal of controls being approved) Sediment fence removal approved (email of approval to remove sediment fence in GEP following stabilisation) Reinstatement Register Rev 1 RP 12_04_2016	Process to temporarily remove is through field inspections and emails. Sighted an email 7 April 2016 between JKC and CVL-7 E300/400 open drain weep holes. Removal of drains/sediment traps required for module movement typically within the site. Compliant with the ESC plan requiring notification to Company. Where controls were removed an example of replacement controls in the form of gravel bags within the u-ditch was demonstrated during the field inspection. Reinstatement register and email allowing controls to be removed demonstrates how stabilisation is assessed and then directive to remove controls is provided. Dates of approval to removal controls (for all catchments) would limit opportunity for removal of controls prior to stabilisation being achieved (may be the case that approval for removal of controls occurred via the one email but this is not currently clear in the register. Letter from CDM Smith identified that controls had been removed prior to catchment being stabilised in accordance with IECA guidelines. Anecdotal evidence from Company identified that the location where the control was removed prior to stabilisation was rectified immediately to return to compliance.	O
IMPLEMENTATION AND MAINTENANCE				
6.5.07	All erosion and sediment controls of endorsed ESCPs must be implemented prior to the commencement of works for which they have been designed, especially prior to the onset of the wet season annually.	CPESC Inspection Letter undertaken by CDM Smith - 23 September 2015. CPESC Verification letter, CDM Smith. dated 1st of October 2015.	CPESC 1 Oct provided letter confirming implementation of ESC.	A
6.5.08	All erosion and sediment control features, plant/equipment must be maintained, e.g. restoring capacity of the sedimentation basins and rock filter dams through desilting as necessary after rainfall events, subject to daily inspections and when weather conditions permit, in accordance with the IECA (2008) guidelines. Sediment controls other than sediment basins, shall be desilted prior to accumulation of silt up to one third of the capacity. In the event this does not occur, the requirements in Chapter 8 Corrective and Preventative Action will be implemented.	ESC Tracking register REV T 060416. JKC maintenance register for erosion sediment controls dated 06/04/2016 sighted during audit. Describes action needed. CPESC Compliance Inspection Letter 29 October, 2015, CDM Smith. CPESC Compliance Inspection Letter 26 February 2016 CDM Smith.	ESC tracking register showing ESC repairs and maintenance - priority list. Third part CPESC inspection after wet season commenced to confirm continued implementation. Throughout plant site the erosion and sediment controls were well maintained and areas that were identified in previous inspection lists had been closed out. Temporary geofabric lined drains had been desilted via sucker truck. Anecdotal evidence revealed that perimeter controls in the form of sediment fence was replaced when damaged by wind to a rock berm (following consultation with CPESC). The beach valve area was an area of concern during the inspection. Maintenance to the sediment fence adjacent to the access track was required, a drainage line with check dams required desilting and perimeter rock berms contained gaps. JKC representative indicated that the controls would be addressed when the construction team in that location returned from R&R on Wednesday 20 April 2016.	O

Number	Mitigation measure	Comments/ Compliance Evidence	Findings	A/O/N/C/ N/A
6.5.10	Active discharge of water from a sediment basin offsite requires approval from Contractor Environmental Representative as per the Water Discharge Procedure (L290-AB-PRC-10265). Water being actively discharged from sedimentation basin must comply with the water quality criteria of Table 6.4.4.	Done through MYOSH system. Dewatering Permit 00843 dated 14/04/2016. (from excavation as no sediment basins in CEMP area). Sighted during Audit. Done through MYOSH system. Dewatering Permit 00816 dated 04/04/2016. (from excavation as no sediment basins in CEMP area). Sighted during Audit. MYOSH dewatering permit for excavation - surface water - from C500 footing 00816 - permit - offsite discharge. NT EPA Letter 18 Dec 2013, EN2011/0234-02~0095 permitting the use of the flare pad basin as "final stormwater sediment detention basin". JKC Email dated 6 June 2015 including risk assessment for use of flare pad basin for stormwater disposal.	A review of the discharge water permits for the last 12 months demonstrates that the flare pad basin has been increasingly used for disposal of stormwater and pot hole slurries. This is consistent with the risk assessment undertaken and considered by the auditor to generally meet the intention of the NT EPA letter. The risk assessment assumes the basin design is in accordance with IECA guidelines, however this has not been verified by the auditor. The risk assessment acknowledges that the flare pad basin passively discharges to the environment therefore the testing of waters prior to entry (controlled by the Dewatering Permit System) is critical to managing the risk to environment. It is the auditors opinion that the robustness of the contamination risk assessment in the permit system is not currently sufficient to prevent a potentially contaminated water discharge or a discharge of groundwater into the basin.	O
6.5.11	Personnel who are involved in maintenance of erosion and sediment controls, and dewatering activities will be suitably trained in the appropriate installation and operation of controls, discharge water-quality requirements, treatment processes and incident reporting procedures.	JKC Erosion Sediment Control Attendance Sheet - ECS TOOLBOX - 24th of August 2015 sighted. Mandatory with all JKC start and contractors. Thomas IECA trained ESC toolbox training undertaken by JKC CVL team responsible for the maintenance and installation of controls are trained in this area Document for training of discharge staff - reference with document provided....	JKC have single point of contact - CPESC training and passed exam. Discharge training outlined what water quality parameters were required. Staff responsible for inspections have received IECA training and deliver toolboxes to staff.	A
6.5.12	Erosion and sediment control management of stockpiles is to be consistent with IECA (2008) guidelines and the most recently endorsed ESCP.	Example seen onsite with stockpiles in FGP covered with geofabrics. GEP/ Beach valve larger stockpiles onsite controlled with stabilisation polymers. Site inspection	Observed stockpiles covered with geofabrics on-site. Minor stockpiles currently but larger stockpiles in GEP over last 12 months. Stockpiles along FGP noted to have geofabric covering. Sediment controls in the form of sediment fence and rock berms were identified across the extent of the site. Management of stockpiles at beach valve were less well managed from an erosion perspective (some were not compacted). Sediment controls were present downslope of the stockpiles, though in some areas required maintenance in the form of desilting and closing of gas in rock berm.	A
6.5.13	Long-term soil stockpiles will be protected to avoid or minimise erosion. Short-term stockpiles (<1 month) will be stabilised if warranted by site-specific risks. Stabilisation techniques may include compaction, soil stabilisers, matting or other slope stabilisation products. Erosion and sediment control management of stockpiles is to be consistent with IECA (2008) guidelines and the most recently endorsed ESCP.	Sheeting with fine crushed rock. Soil stabiliser used along FGP. Vita-bond/vita- strike also used. Mulch used on batter slopes witnessed onsite and on ASS/Pass Pad with ESCP. Site Inspection	Refer to ESCP. As above Long term stockpiles in the EMA were not included in the assessment.	A
6.5.14	If soil erosion is evident, exposed surfaces at the affected area will be stabilised with whatever means is considered practicable and satisfactory (e.g. matting, soil stabiliser, mulching) to mitigate and stabilise the area in accordance with the relevant ESCP to meet the IECA guidelines.	Sheeting with fine crushed rock. Soil stabiliser used along FGP. Vita-bond/vita- strike also used. Mulch used on batter slopes witnessed onsite and on ASS/Pass Pad in accordance with ESCP. Witnessed onsite during site visit.	Observed sheeting with FCR. Soil stabiliser along FGP, matting. - mulch on batter slopes. Notable erosion was not observed during site inspections. Erosion control methods were extensively used across site, including geofabric, polymers, gypsum application, mulch on batter slopes and the ASS Pad and finishing of surfaces such as cement stabilised roads, Fine Crushed Rock (FCR) covering and gravel sealing. Revegetation of areas along the GEP was stabilising areas to prevent erosion. These were installed in accordance with IECA guidelines.	A
6.5.15	Site roads will be bitumen sealed (where appropriate) to minimise sediment transport to surface drainage channels.	Cement stabilised roads and fine crushed rock used on roadways and witnessed on site.	Cement stabilised pavements on roads, FCR on roads where possible. Bitumen sealing has not been used widely due to phase of construction, however cement stabilised roads, Fine Crushed Rock (FCR) covering of roads has been undertaken.	A
6.5.16	Contaminated soils (including sediment removed from basins and rock filter dams that is suspected of being contaminated) will be managed in accordance with Section 6.12 Waste management.	CDM Smith letter.	Review of location outlined in CDM letter demonstrated where sediment build-up was identified and had been effectively cleaned-up. Sediment collected in basins underwent laboratory testing prior to being removed (to EMA if no contamination identified, offsite if determined to be contaminated). Lab reports across different areas demonstrate testing prior to management of accumulated silt.	A

TABLE 2-3 CEMP
AUDITOR EVIDENCE TABLES - 18-22 APRIL 2016

Number	Mitigation measure	Comments/ Compliance Evidence	Findings	A/O/N/C/ N/A
6.5.18	Following completion of construction activities, the site will be progressively stabilised and/or revegetated in line with the final site designs as approved by Contractor and Company.	Example provided of reinstatement process from sub-contractor to contractor. No areas yet handed back to Company. MKT. Reinstatement Procedure - Onshore Gas Export Pipeline works - L 280-AC- PRC- 10002 dated 2 March 2016. Provided to Tim by JKC. MKT. Reinstatement Checklist and Close Out - Appendix D - Reinstatement Procedure - Onshore Gas Export Pipeline works - L 280-AC- PRC- 10002 dated 2 March 2016. MKT.Completed Reinstatement Checklist and Close Out - Appendix D - Reinstatement Procedure - Onshore Gas Export Pipeline works - 63120_ENV-FRM-022-dated 9/4/2016.	Sighted reinstatement procedure - onshore gas pipeline works. Approved by company and contractor Rev 1. Appendix D has a reinstatement checklist. Subcontractor uses Appendix D form to hand back areas to contractor. The site inspection identified locations where final site designs were being implemented to stabilise previously disturbed areas. This included the revegetation of the GEP, gravel sealing and concreting at BLD-1, installation of concrete U-ditch, and concreting.	A
MONITORING AND INSPECTIONS				
6.5.19	Erosion and sediment control devices and stabilised surfaces including sealed areas will be inspected regularly to check they are maintained and are in good working order. Inspections should also be undertaken following rainfall events to assess the requirements for maintenance or upgrades to sediment and erosion control devices. All monitoring and inspection will be undertaken in accordance with the IECA (2008) guidelines and any relevant procedures.	Weekly Inspection during wet season. ESCP Compliance Inspection 011280 dated 05/04/2016 sighted during audit. Post Rain Inspection. Document Number 011362. date 07/04/2016.	Weekly inspection - active construction areas, reinstatement areas inspected weekly also. Rain event greater than 10 mm. MYOSH list of post rainfall inspections (LPI66). Identifies areas needing improvement. MYOSH housed all post rain and weekly inspections undertaken, appeared to have been undertaken at sufficient intervals to meet requirements. Post rainfall inspection is undertaken following 10mm of rainfall. This is determined by site weather gauge and passed onto sub-contractors informing them that post rain inspection is required.	A
6.5.20	Monitoring of the water-quality parameters listed in Table 6.4.4 will be carried out prior to active discharge from sediment basins, excavations or other areas of collected water off site. Monitoring of the parameters will be conducted using calibrated hand-held monitoring devices.	CVL4_Calibration_PH_turbidity_calibration.pdf Testing Register for pH and for turbidity provided. Dated 18 March 2016.	No lab testing required for ESC control discharges. Turbidity and pH main test by on-site sub-contractor. Sighted sub-contractor calibration log from Wagners July 2015 - March 2016 (CVL4). Meters are used to test pH, turbidity tubes for turbidity levels. Visual assessment by the sub-contractor for hydrocarbon and scum contamination. This is being undertaken prior to active discharge, with permits issued by contractor in MYOSH following review of the data. Anecdotal evidence that photographs of pH meters, turbidity tubes and, where required, the location are provided in the dewatering permit application this reduces the potential for the sub contractor duping the contractor.	A
6.5.21	Water-quality sampling will be performed by a suitably qualified environmental or water-quality professional. Sampling including collection, preservation, handling, storage and transportation will be carried out in consideration of the relevant Australian standard(s). All laboratory analyses for environmental samples will be undertaken by a NATA-accredited laboratory.	Sub-contractor training package on surface water testing. Document name Surface water testing training , East Arm Civil, 14 April 2016. Completed test. 2.2.16.	No lab testing required for ESC control discharges. Turbidity and pH main test by on-site sub-contractor. Sighted sub-contractor training records for testers.	A
6.5.22	Contractor shall conduct weekly ESC compliance inspections to assess and report on the level of compliance throughout the wet season. Contractor ESC compliance inspection reports shall be provided to Company. In the event that a non-compliance is identified, an incident report shall be completed using the online event reporting database in accordance with Chapter 8 Corrective and preventative action.	Weekly Inspection during wet season. ESCP Compliance Inspection 011280 dated 05/04/2016 sighted during audit. MYOSH search result of all weekly ESCP Compliance Inspection.	Weekly inspections - OK. Inspections are being carried out weekly by JKC as outlined in MYOSH. JKCs CPESC also carried out inspections and identified areas requiring improvement. Company outlined during inspection that if an control issue was not rectified in the appropriate timeframe was returned to compliance.	A
6.5.23	Erosion and sediment control events which require reporting in accordance with Chapter 8 Corrective and preventative include but are not limited to: • Any erosion and sediment control non-compliance with this CEMP, site ESCP/s, IECA guidelines, permits or approval conditions • Site inspections or audits identify that an ESCP has not been properly developed, approved or implemented prior to the commencement of construction activities • An ESC has failed during a rain event that it was design to withstand • Site ESC inspections are not conducted at the required frequency • ESCPs have not been fully implemented prior to the commencement of the wet season • Capacity of sediment controls is not restored in accordance with IECA timeframes following rain events	ESC Tracking register REV T 060416. JKC maintenance register for erosion sediment controls dated 06/04/2016 sighted during audit. Describes action needed.	Action Tracking List -used to track non -compliances. Done on a weekly basis.	A
Table 6.6.5 - Acid Sulphate Soil Mitigation Measures				
ASS EXCAVATION				
6.6.08	Approval from the Project Environmental Manager or delegate will be obtained before the commencement of excavation and treatment of ASS. The Project Environmental Manager will take weather conditions into account when deciding whether to issue approval. Sampling and laboratory analysis of ASS during excavation will be conducted at frequencies recommended by the relevant guidelines. Sampling and analysis methods recommended in these guidelines will also be adhered to.	ASS Disturbance Permit Register_Rev 1 _62120-ENV-FRM-006 08 Sept 2015 sighted during audit. ASS Disturbance Permit and Protocols. V-31P0-GEP-1-52204. Dated 15/06/2015.	Sub-contractor ASS Disturbance procedure- sighted a permit for 15-16 June 2015 - specifies liming rate.	A
ASS MANAGEMENT AND TREATMENT				
6.6.10	ASS or suspected ASS that has been transferred to the treatment pads or contained facilities will be treated in accordance with the following: • ASS treatment shall be undertaken during appropriate weather conditions (as determined by the Project Environmental Manager). • The ASS placed on treatment pad or contained facilities will be treated with the selected neutralising agent at a rate determined by soil sampling results in accordance with QASSIT. • All ASS treatment shall achieve <0.03% oxidisable sulphur percentage or equivalent nett acid generation potential (TPA/TAA in mol H+/tonne) (as confirmed by verification sampling)	Sighted photos of mixing adjacent to trench and on treatment pad. ASS Disturbance Permit and Protocols. V-31P0-GEP-1-52204. Dated 15/06/2015.	No further deep soil mixing was undertaken. Following the observation from last audit all soil excavated in intertidal zone was transferred to treatment pad or treatment was undertaken on small stockpiles adjacent to trench and mixed with lime - (stockpiles <1000 m3).	A

Number	Mitigation measure	Comments/ Compliance Evidence	Findings	A/O/N/C/ N/A
VERIFICATION SAMPLING				
6.6.11	Verification sampling will use the frequencies and sampling and analysis methods recommended by the current QASSIT guidelines.	ASS Disturbance Permit and Protocols. V-31P0-GEP-1-52204. Dated 15/06/2015.	Attached to the ASS Disturbance permit are the validation results (NATA accredited laboratory) and signed off by sub-contractor and contractor.	A
6.6.12	ASS soils must not be removed from the ASS treatment pad or contained facilities until laboratory results have verified the soils to be below the ASS criteria. Once the ASS is treated and laboratory verification sampling indicates that the soils are neutralised, the treated material will no longer be considered ASS. As such, the treated material can be placed as non-structural fill (where appropriate) within the Site or within the EMA. If the treated material cannot be re-used, it may be buried within the Site or the EMA in location(s) where environmental impacts are minimal (i.e. not in sensitive areas, threatened species or cultural heritage sites). Records of all ASS treatment verification sampling must be retained by Contractor. Where treated and verified material is disposed of to the EMA, records of verification and the location of disposal must be maintained on site and made available to the Department of Mines and Energy annually as part of the revised MMP. In the event that verification sampling results do not confirm that the soils have been treated to below the ASS criteria, the material will be retreated and reverified in accordance with the QASSIT guidelines.	ASS Disturbance Permit and Protocols. V-31P0-GEP-1-52204. Dated 15/06/2015.	Attached to the ASS Disturbance permit are the validation results (NATA accredited laboratory) and signed off by sub-contractor and contractor.	A
MONITORING AND INSPECTIONS				
6.6.13	The intertidal marine sediments and bio-indicators monitoring described in the EIMP will be implemented to determine if construction activities undertaken in ASS have resulted in changes in pH and in the bio-availability of heavy metals in adjacent marine sediments. Monitoring will occur in close proximity to sediment basins and construction areas with a high ASS risk. Marine sediments must comply with the sediment criteria in Table 6.6.1. Bio-availability of metals in bio-indicators must comply with the criteria in Table 6.6.2.	Quarterly monitoring reports.	Monitoring did not identify any attributable impacts.	A
CEMP Table 6.13.4 Dangerous Goods and Hazardous Materials Mitigation Measures				
CHEMICAL SELECTION AND MANAGEMENT				
6.13.03	Contractor will use electronic and auditable system software to maintain a hazardous materials register and database of information relating to each chemical, including health hazards and precautions, safe handling procedures, requirements for storage and transport, environmental fate and ecological toxicity, and emergency and first aid advice. The hazardous materials tracking system will have the capability to generate reports, labels, printouts of the SDS, risk assessment modules, chemical registers and stock management reports.	Chemalert Safety Data Sheet - Kidde Be Dry Fire Fighting Chemical	Chemalert system been the system used for tracking hazardous and dangerous goods since the start of the project. System includes a database of information relating to each chemical including detailed SDS's, toxicity information, transport handling and storage and manifests. Chemalert has the capacity to generate manifest reports, print labels, SDS as required. Chemalert printouts were observed in use at chemical storage locations around the site.	A
6.13.04	A chemical approval and selection process and management controls will be implemented to minimise the potential adverse environmental impacts associated with the storage, transport, use and disposal of chemicals.	Chemalert software accessed and viewed during Site. https://chemalert.rmt.com.au/inpex/PreviewReport .	Assessment of environmental impacts assessed by JKC individual. The assessment of adverse chemical impacts does not appear to be a documented process.	O
6.13.05	All chemicals and hazardous materials will be submitted to Contractor for review and approval prior to procurement or being brought on Site. The review process will examine the following: • ecotoxicological data in the SDSs • legislative and other requirements • exposure pathways and potential environmental impact of release, and risk assessment • preference for lowest toxicity, lowest bioaccumulation potential and highest biodegradation and lowest content of volatile organic compound (VOCs) • suitable and less-toxic alternatives • procedures covering transport, storage, handling and disposal • training needs • information and reports available via the hazardous materials management system. Approved chemicals will be entered into the hazardous materials management system. The approved chemicals register will be provided to Company upon request. Where chemical approval may result in a changed risk level for an activity, this will be incorporated into the environmental risk register and communicated to Company.	Chemalert used for approval, ADM Material Safety Data Sheets. Lactic Acid 88% FCC and Lactic Acid 88%. Anthony Black. Draft Document. Corrosion Inhibitors Paints Assessment. ChemAlert JKC Australia Tridol S3 Accessed 20/04/2016 - JKC toxicologist review undertaken 04/11/2015.	TRIDOL: Sourced from UK. SDS was not appropriate for Australia so JKC employed Risk Management Technologies to develop a SDS for the product. Identified product as Hazardous. Identified in Chemalert as toxic to marine life on 4 Nov 2015. Spill occurred in October 2015. Chemical was on-site prior to the completion of the review process which was considered a contributing factor to the incident. During questioning it was made known that some chemicals used to be quarantined on-site prior to approval. Since the incident there has been an increased focus on following this process and increased attention to use of Chemalert.	N
6.13.06	A dangerous goods and hazardous materials register will be maintained on site using a hazardous materials management system and will comply with the following requirements: • include a list of all hazardous materials used, handled or stored at the workplace • be maintained monthly to check the information is up to date • include the current SDS for each substance listed be readily accessible to workers involved in using, handling or storing hazardous chemicals, or any personnel with the potential for exposure to hazardous substances, including first-aid and emergency response personnel.	Chemalert software accessed and viewed during Site. https://chemalert.rmt.com.au/inpex/PreviewReport .	Chem Alert has approval and stock holding. Demonstrated that the Chem Alert can generate a register of all DG and Hazardous Goods. Subcontractors update chemical stockholding monthly basis.	A
6.13.07	Safety Data Sheets (SDS) will accompany all chemicals brought to site. SDSs will be made available where chemicals are stored, handled or used to aid the identification of appropriate handling procedures, spill clean-up and disposal methods, and first-aid response.	ChemAlert SDS print outs sighted during audit.	Site inspections of hazardous/dangerous goods storage area demonstrated that up to date SDS's were present with the chemicals being stored.	A
6.13.08	Use of the following substances is prohibited on Site and any project vessels or equipment: • polychlorinated biphenyl (PCB) type fluid • asbestos • antifouling paints containing tributyltin (TBT) compounds.	Chemical prohibition list.	TBT not included in prohibition list and it is recommended that it be added.	O
6.13.09	Appropriate licences will be obtained for the storage of dangerous goods in accordance with the Dangerous Goods Regulations (NT).		Dangerous Goods Regulations (NT) only require a licence for explosives. No explosives known to be stored on-site.	NA

TABLE 2-3 CEMP
AUDITOR EVIDENCE TABLES - 18-22 APRIL 2016

Number	Mitigation measure	Comments/ Compliance Evidence	Findings	A/O/N/C/ N/A
6.13.10	Dangerous goods and hazardous materials, as defined above, will be stored, handled and used in dedicated locations around the Site to minimise the likelihood of, and impacts resulting from, the release of hydrocarbons and chemicals. All chemical use, storage, handling and transport must comply with legislative and other requirements, including Australian standards and Codes of Practice as applicable to the activity.	Risk assessment for bunded area in OPS-1 waste area. Storage of Transformer Oils (C2) dated 18/06/2015. Includes Action Plan at the bottom of RA.	Noted that there is an increased demand for chemical storage areas on-site and that some areas may be retro fitted to meet applicable standards and guidelines. An example is the use of the waste transfer area for chemical storage. It is noted that a risk assessment was completed in June 2015 which identified a number of modifications to the waste storage area to make it suitable for chemical storage during the wet season, however the modifications were not made until April 2016 (after the wet season). In future chemicals should not be stored in the locations until the action items from the risk assessment are actioned.	O
PRIMARY CONTAINMENT				
6.13.12	Primary storage containers must: • be designed and used in accordance with the applicable Australian standards • be labelled in accordance with the Globally Harmonized System of Classification and Labelling of Chemicals and the approved codes of practice under the Dangerous Goods Act (NT) • have lids and no dents or damage • comply with the WHS (NUL) Act and WHS (NUL) Regulations	Sighted during audit visit at OPS-1 workshop and JKC - Warehouse. Bunding primary containment for controlled waste storage area, perceptor secondary containment. Perceptor primary containment for WST-1 area. Ventia. Enviropacific.INPEX Controlled Waste Storage Area - Barrier Boom. Dated 04 February . Risk assessment for bunded area in OPS-1 waste area. Storage of Transformer Oils (C2) dated 18/06/2015.	Tridol Expandol storage containers inadequate resulting in notifiable spill. This material was brought on-site prior to completion of the chemical review process. Appears to have been large improvement in checking of primary containment of all chemicals brought on-site.	N
SECONDARY CONTAINMENT				
6.13.13	All liquids classified as dangerous goods and hazardous materials must be secondarily contained. This includes using double-skinned tanks, or storing hazardous materials within a sealed bund compound or over a portable bund.	Bunding primary containment for controlled waste storage area, perceptor secondary containment. Perceptor primary containment for WST-1 area. Ventia. Enviropacific.INPEX Controlled Waste Storage Area - Barrier Boom. Dated 04 February . Risk assessment for bunded area in OPS-1 waste area. Storage of Transformer Oils (C2) dated 18/06/2015.	Observed the former waste storage area is now the bulk chemical storage area. Risk assessment details. Noted that the bund was not installed prior to the use of the facility for chemical storage.	O
6.13.15	Dangerous goods and hazardous chemical storage areas must be suitably located and bunded to minimise the impact of any spillage of contamination. Bunding must be undertaken in accordance with relevant legislation and standards.		In the main chemical storage area and temporary storage area DG's and hazardous chemicals appeared to be stored in compliance with relevant guidelines and standards.	A
6.13.16	Bunded water shall be managed as per Section 6.4 <i>Surface-water management</i> .	OPS -1 dewatering permit for oil water separator in workshop area. 160227 - OPS1 Dewatering Permit DP484 dated 27.02.2016 160218 Workshop Tank RESULTS NT45015 dated 28.01.16 160218 Workshop Tank RESULTS 2 NT45015 dated 28.01.16	OPS-1 bund (former waste area) water quality. Used for dust suppression. Unclear if permit provided linked to lab results provided. Evidence of hydrocarbons in water and still used for dust suppression.	O
6.13.18	Suitable firefighting equipment and spill-containment equipment appropriate to the hazardous substances and chemicals must be provided and made readily accessible to personnel in the event of a spill.	Firefighting equipment and spill kits sighted during site visit.		A
MONITORING AND INSPECTIONS				
6.13.33	Dangerous goods and hazardous materials storage containers, areas and secondary containment measures such as bunds, sumps and pits including those on vessels will be inspected (for integrity, labelling etc.) as part of the weekly inspection regime. Inspection records will be made available to Company upon request.	MYOSH Environmental Hazards.	Dangerous goods storage area regularly inspected by JKC staff.	A
6.13.34	Fittings, pipes and hoses on tanks or equipment which store hazardous materials will be inspected weekly and maintained as required.	MYOSH Environmental Hazards.	On-site refuelling area regularly inspected.	A
6.13.35	A weekly dangerous goods and hazardous materials checklist will be developed and will be used to record the findings of weekly inspections, including fuel reconciliation/use, housekeeping and inspections of storage areas..	MYOSH Environmental Hazards.	MYOSH maintains a list of findings from weekly inspections of dangerous goods areas.	A
Table 6.14.3 - Spill Prevention and Response Mitigation Measures				
GENERAL				
6.14.03	All spills (any uncontrolled release of hydrocarbon, chemicals, liquid waste or other hazardous substances) must be reported, recorded and cleaned up in a timely manner. For minor non-reportable spills as defined by Table 6.14.4 Spill reporting levels, Subcontractor records the spill in their spill log and provides to Contractor each month along with their monthly report. Contractor reports total spill numbers and volumes to Company monthly in the monthly report. For spills that are reportable as an environmental incident, as defined by Table 6.14.4 Spill reporting levels, Subcontractor reports the incident to Contractor. Contractor reports the incident to Company. Company makes a determination on whether the incident is reportable to the NT EPA, and reports accordingly. For marine spills of any volume, Subcontractor reports to Contractor as an environmental incident, Contractor reports to Company. Contractor completes a POLREP and notifies the DPC Harbourmaster, Port Management Officer, and AMSA. Contractor simultaneously sends the POLREP to Company and Company forward on to the NT EPA via pollution@nt.gov.au.	"Environmental Incidents as a t 1 May 2015 - 16 April 2016 - Mysosh filtered data viewed during site audit. MYOSH system - LPI - Loss prevention Inspection viewed during site visit. Environmental Incidents - 1 May 2015 to 16 April 2016 - Print out from MYOSH viewed during site visit. Environmental Hazards - 1 May 2015 to 16 April 2016 - Print out from MYOSH viewed during site visit. INPEX Environmental Incident Register_onshore only.xcl provided"	MYOSH searched for spill and identified number of spill entries on-site (none to water). Internal reporting of spills in accordance with Table 6.14.4 of CEMP Rev 17 appears to be in compliance. Based on the review of the spill entries the notifications made by INPEX to NT EPA are deemed appropriate.	A

Number	Mitigation measure	Comments/ Compliance Evidence	Findings	A/O/N/I/ N/A
6.14.04	Spill-response materials and equipment (including personal protective equipment) will be made available at all times and will be appropriate to the substances being stored on Site.	Spill Kits noted at all sub-contractor sites visited during audit visit.	Spill kits observed were considered appropriate.	A
6.14.05	Appropriate and adequate volumes of spill response equipment will be stored at strategic locations around the Site, and will be: • located near areas where chemicals and/or hydrocarbons are stored, handled and used, which may change as construction progresses • visible and easily accessible • kept within service or mobile refuelling vehicles • suitable for the types and volumes substances being used, handled or stored at the location Locations of spill-response equipment are to be communicated to all personnel, and location plans will be updated regularly. Locations of spill response equipment are included in Figure 6.14.1. Spill response equipment shall be restocked following a spill, and shall be checked at least monthly by Subcontractors to ensure adequate volumes of equipment are readily available.	Spill Kits noted at all sub-contractor sites visited during audit visit. Dangerous and corrosive goods kept in DG containers with in built bunds.	Spill kits observed were considered appropriate.	A
NOTIFICATION				
6.14.15	Upon identification of a spill, the appropriate spill response will be initiated and the appropriate supervisor and site management will be notified.		Appropriate internal reporting of spills in accordance with CEMP Table 6.14.6 appears to be occurring based on review of MYSOH records.	A
6.14.16	For non-reportable spills as per Table 6.14.4, the Subcontractor Environmental Representative shall maintain records on a spill log and be responsible for ensuring adequate clean up. The spill log will be maintained by Subcontractor and submitted to Contractor as part of the monthly report.		Spill log maintained in MYOSH.	A
REMEDIATION				
6.14.21	Following a reportable spill (in accordance with Table 6.14.4) the Project Environmental Manager (or delegate) will conduct a visual assessment of the site after clean-up, supported by validation sampling where appropriate, to determine whether further remediation or ongoing monitoring is required. If remediation is required, a remediation action plan will be developed after a risk assessment has been completed to fully detail the remediation and clean-up program. The remediation action plan will be approved by Company prior to the remediation execution. All Contractor's records related to reportable spills will be documented and maintained within Contractor's database. Records will be made available to Company as part of the incident reporting process.	Kaefer 2015. <i>Remediation Action Plan – September 2015</i> . provided by JKC. Kafer 2015. C100 Satellite Crib Room Genset Hydrocarbon spill JKC Incident Report # 004013 and 004262 October 2015. provided by JKC.	Incident report 4262, 14 October 2015, 180L spill was a reportable spill (180L diesel on hardstand) requires risk assessment and Remediation action plan. No evidence was provided that the reports were provided to, or approved by company. Remediation of the Tridol and expandol spill has been completed.	O
INSPECTION AND MONITORING				
6.14.24	All reportable spills (in accordance with Table 6.14.4) must be reported as an environmental incident in accordance with Chapter 8 Corrective and preventative action. Verbal notification by Subcontractor to Contractor Environment Representative shall occur immediately. Contractor will then immediately verbally notify a Company Representative. Company Representative is responsible for reporting to the regulator/s as required, as soon as practicable, and no later than 24 hours after the event has occurred.	MYOSH incident records.	Appropriate internal reporting of spills in accordance with CEMP Table 6.14.6 appears to be occurring based on review of MYSOH records including environment incident register.	A
6.14.27	Spill incidents where reporting is required in accordance with Table 6.14.4 would need to undergo an assessment for environmental consequence as per Chapter 8 Corrective and Preventative Action for further appropriate levels of internal and external reporting.	MYOSH Environmental Incident 004260 14/10/2015. MYOSH Environmental Incident 004262 14/10/2015.	Incident reports sighted both include and assessment of environmental consequence as per Chapter 8 of the CEMP.	A

Annex D

Statutory Declaration

THE NORTHERN TERRITORY OF AUSTRALIA

STATUTORY DECLARATION

(1) Insert full name and address of person making declaration

I, Paul Steven Fridell of Environmental Resources Management Australia Pty Ltd located at Level 3, Tower 3 World Trade Centre 18-38 Siddeley Street Docklands, Victoria.

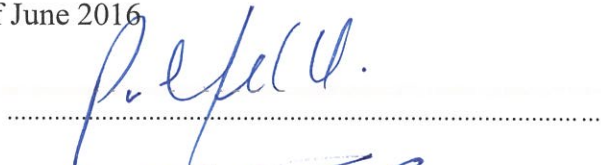
(2) Here insert the matter declared to, either directly following the word "declare" or, if the matter is lengthy, insert the words "as follows" and thereafter set out the matter in numbered paragraphs

solemnly and sincerely declare that the results are accurate to the best of my knowledge or belief and that I have not included in the results information that I know or suspect to be false or misleading or failed to include in the report information that I know to be relevant.

This declaration is true and I know it is an offence to make a statutory declaration knowing it is false in a material particular.

Declared at Melbourne the 15th day of June 2016

(3) Signature of the person making the declaration



(4) Signature of the person before whom the declaration is made

Witnessed by:



Christopher Kennedy Ford

(5) Here insert full name of person before whom the declaration is made, legibly written, typed or stamped

Environmental Resources Management Australia Pty
Ltd located at Level 3, Tower 3 World Trade Centre 18-38 Siddeley Street Docklands, Victoria.

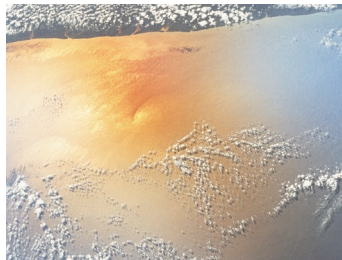
(6) Here insert contact address or telephone number of person before whom the declaration is made

NOTE: This declaration may be witnessed by any person who is at least 18 (eighteen) years of age.

NOTE: This written statutory declaration must comply with Part 4 of the *Oaths Affidavits and Declarations Act*.

NOTE: Making a declaration knowing it is false in a material particular is an offence for which you may be fined or imprisoned.

ERM consulting services worldwide www.erm.com



Environmental Resources Management Australia

Level 3, Tower 3, World Trade Centre

18-38 Siddeley Street, Docklands VIC 3005

Telephone (03) 9696 8011

Facsimile (03) 9696 8022

