Further information required for assessment by preliminary documentation

Atlas Stage 3 Gas Project, near Wandoan (EPBC 2022/09410)

On 19 May 2023, a delegate of the Minister for the Environment and Water determined the above project is a controlled action due to likely significant impacts on the following matters protected under Part 3 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act):

- Listed threatened species and communities (sections 18 & 18A); and
- A water resource, in relation to coal seam gas development and large coal mining development (sections 24D & 24E).

The delegate also determined that the proposed action will be assessed by preliminary documentation. Preliminary documentation for the proposal will include:

- The information contained in the original referral;
- Specified information relating to the action that was given to the department after the referral but before the assessment approach decision;
- The further information you provide on the impacts of the action and the strategies you propose to avoid, mitigate and offset those impacts (as described below); and
- Any other relevant information on the matters protected by the EPBC Act.

The preliminary documentation should be sufficient to allow the Minister (or delegate) to make an informed decision on whether to approve, under Part 9 of the EPBC Act, the taking of the action for the purposes of each controlling provision above.

The preliminary documentation must address the matters set out below and follow the content, style and formatting requirements set out in Appendix A.

1. DESCRIPTION OF THE ACTION

Information required	
1.1	The location, boundaries and size (in hectares) of the maximum disturbance footprint and of any adjoining areas which may be indirectly impacted by the proposal, including nearby vegetation. Include mapping and coordinates.
1.2	A description of all components of the action, including the anticipated timing and duration (including start and completion dates) of each component of the project. All construction, operational and (if relevant) decommissioning and rehabilitation components of the proposed action should be described in detail. Include details regarding the methods and processes to be used to access and extract the gas resource (including stimulation, dewatering, etc.). In addition, any components which were included in the referral material, but are no longer part of the proposed action, must be clarified.

1.3	A description of the operational requirements of the action, including any anticipated maintenance works.
1.4	A description of the surrounding land uses.
1.5	If available, an indicative layout plan for the proposed action area, including key infrastructure (the number and location of wells, gas/water transmission pipelines, gas facilities, water storage/management facilities, power generation facilities, etc.). If available, include mapping and coordinates for each of the above. Where existing approved infrastructure will be utilised, this should be clearly articulated.
1.6	To the extent reasonably practicable, provide any alternatives to the proposed action, including a comparative description of the impacts of each alternative on the matters protected by the controlling provisions for the action.
1.7	Provide a description of any approval that has been obtained from a State or Commonwealth agency or authority, including any conditions that apply to the action. Include a statement identifying any additional approval that is required.
1.8	Include updated information if any changes have been made to the project since the referral documentation was submitted.

2. LISTED THREATENED SPECIES AND COMMUNITIES

Background

Based on the information provided in your referral, and other available information, the department considers that the listed threatened species and communities identified below may be significantly impacted by the proposed action:

- Australian Painted Snipe (*Rostratula australis*) – Endangered;
- Belson's Panic (*Homopholis belsonii*) – Vulnerable;
- Bluegrass (*Dichanthium setosum*) – Vulnerable;
- Brigalow Woodland Snail (*Adclarkia cameroni*) – Endangered;
- *Calytrix gurulmundensis* – Vulnerable;
- Collared Delma (*Delma torquata*) – Vulnerable;
- Corben's Long-eared Bat (*Nyctophilus corbeni*) – Vulnerable;
- Curly-bark Wattle (*Acacia curranii*) – Vulnerable;
- Diamond Firetail (*Stagonopleura guttata*) – Vulnerable;
- Dulacca Woodland Snail (*Adclarkia dulacca*) – Endangered;
- Dunmall's Snake (*Furina dunmalli*) – Vulnerable;
- Greater Glider (central and southern) (*Petauroides volans*) – Endangered;

- Grey Snake (*Hemiaspis damelii*) – Endangered;
- Koala (*Phascolarctos cinereus*) (combined populations of Qld, NSW, and the ACT) – Endangered;
- Northern Quoll (*Dasyurus hallucatus*) – Endangered;
- Ooline (*Cadellia pentastylis*) – Vulnerable;
- Painted Honeyeater (*Grantiella picta*) – Vulnerable;
- Slender Tylophora (*Vincetoxicum forsteri*) – Endangered;
- South-eastern Glossy Black-cockatoo (*Calyptorhynchus lathami lathami*) – Vulnerable;
- Squatter Pigeon (southern) (*Geophaps scripta scripta*) – Vulnerable;
- Yakka Skink (*Egernia rugosa*) – Vulnerable;
- Yellow-bellied Glider (south-eastern) (*Petaurus australis australis*) – Vulnerable;
- Brigalow (*Acacia harpophylla* dominant and co-dominant) – Endangered; and
- Poplar Box Grassy Woodland on Alluvial Plains – Endangered.

Please note, the list above may not be a complete list of listed threatened species that will or are likely to be impacted by the project. It is the proponent's responsibility to be aware of any changes to the distribution of listed threatened species and ecological communities, and information available in the Species Profile and Threats (SPRAT) Database. The proponent must ensure that a recent Protected Matters Search Tool (PMST) report has been generated and considered before finalising the draft preliminary documentation.

2.1 Habitat assessments

Habitat assessments must be informed by desktop and field surveys (in accordance with departmental guidelines or as defined by evidence-based best practice), and with reference to relevant departmental documents (e.g. approved Conservation Advices, Recovery Plans, draft referral guidelines and Listing Advices, and the SPRAT Database), including published research and other relevant sources. Where habitat assessments depart from departmental information, adequate justification must be provided to substantiate their suitability to the assessment.

The department does not accept the consideration of only Queensland Regional Ecosystem (RE) mapping to determine habitat for listed threatened species. Further, habitat assessments must not only consider remnant vegetation.

Information required	
2.1.1	Provide a habitat assessment for relevant listed threatened species and communities. Please note an assessment must be undertaken regardless of whether the species was recorded in the project area or not.
2.1.2	Identify and describe known historical records of the listed threatened species and ecological communities in the broader region. All known records must be supported by: • an appropriate source (i.e. Commonwealth and State databases, published research, publicly available survey reports, etc.);

	• the year of the record; and • a description of the habitat in which the record was identified.
2.1.3	Include an assessment of the adequacy of any surveys undertaken (including survey effort and timing). In particular, the extent to which these surveys were appropriate for the listed threatened species or community and undertaken in accordance with relevant departmental survey guidelines.
2.1.4	Attach all relevant ecological surveys referenced in the referral and preliminary documentation as supporting documents to the preliminary documentation.
2.1.5	Provide detailed mapping of suitable habitat (within, adjacent to and downstream of the project site, where relevant) for all listed threatened species and communities, which: • is specific to the habitat assessment undertaken for each listed threatened species and ecological community (i.e. does not only illustrate relevant Queensland Regional Ecosystems); • includes an overlay of the project disturbance footprint; • includes known records of individuals derived from desktop analysis and field surveys; and • is provided separately as attachments in JPEG format.

2.2 Impact assessment

The preliminary documentation must include an assessment of direct, indirect and consequential impacts on listed threatened species and communities as a result of the proposed action and must be assessed in accordance with relevant departmental policies and guidelines, including the SPRAT Database.

The department considers the proposed action may result in, but is not limited to, the following impacts:

- vegetation clearance and loss of habitat;
- habitat fragmentation;
- introduction and/or spread of weed species;
- disturbance or displacement from foraging or roosting habitat, or breeding places;
- degradation of habitats as a result of:
    - dust;
    - erosion; or
    - accidental release of hazardous materials.
- fauna injury during construction and operation activities;
- chemical contamination;
- changes to hydrological regimes;

- changes to water quality;
- groundwater drawdown and associated impacts on groundwater dependent ecosystems;
- subsidence; and
- cumulative impacts with other CSG operations in the region.

Information required	
2.2.1	An assessment of the likely impacts associated with the proposed action, including the vegetation clearance, construction, operational, maintenance and decommissioning components of the project.
2.2.2	Include the direct, indirect and consequential/facilitated loss and/or disturbance of protected matters and their habitat as a result of the proposed action. This must include the area (in hectares) and quality of the habitat to be impacted and quantification of the individuals to be impacted (where applicable).
2.2.3	An assessment of the impacts of habitat fragmentation in the project area and surrounding areas, including consideration of species' movement patterns.
2.2.4	An assessment of the likely duration of impacts to protected matters as a result of the proposed action.
2.2.5	A discussion of whether the impacts are likely to be repeated, for example as part of maintenance.
2.2.6	A discussion of whether any impacts are likely to be unknown, unpredictable or irreversible.
2.2.7	Justify, with supporting evidence, how the proposed action will not be inconsistent with: • Australia's obligations under the Biodiversity Convention, the Convention on Conservation of Nature in the South Pacific (Apia Convention), and the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES); and • a recovery plan or threat abatement plan.

2.3 Avoidance, mitigation and management measures

Avoidance and mitigation measures are the primary methods of eliminating and reducing significant impacts on protected matters. The department expects avoidance and mitigation measures to be thoroughly investigated as a part of project design and planning, which must be supported by evidence to demonstrate likely success.

Avoidance of impacts should be prioritised in the first instance. Where not possible to completely avoid impacts on a protected matter, then impacts must be minimised or mitigated as much as possible. The SPRAT Database, and associated statutory documents, may provide relevant mitigation measures for protected matters. Commitments by the person proposing to take the action must be clearly distinguished from recommendations or statements of best practice made by the document author or other technical expert.

Where relied upon for the mitigation/management of impacts, relevant management plans should be included as appendices to the preliminary documentation. Sufficient detail must be provided in each plan to ensure an assessment can be undertaken as to their likely suitability and effectiveness. Please note, the department is likely to recommend to the Minister (or delegate) that any such plans be approved with the proposed action (if approved). In some cases, the department may recommend that the conditions of approval require relevant plans to be approved and implemented after approval but prior to the commencement of the proposed action.

Information required	
2.3.1	Include any relevant plans relied upon for the mitigation or management of impacts on MNES (in approved or draft format) as appendices to the preliminary documentation.
2.3.2	A detailed summary of measures proposed to be undertaken by the proponent to avoid, mitigate and manage relevant impacts of the proposed action on relevant protected matters (including any measures required through other Commonwealth, State and/or local government approvals). Proposed measures must be based on best available practices, appropriate standards, evidence of success for other similar actions and supported by published scientific evidence. All commitments must be drafted using committal language (e.g. 'will' and 'must') when describing the proposed measures. All proposed measures must also be drafted to meet the 'S.M.A.R.T' principle: • S – Specific (what and how) • M – Measurable (baseline information, number/value, auditable) • A – Achievable (timeframe, money, personnel) • R – Relevant (conservation advices, recovery plans, threat abatement plans) • T – Time-bound (specific timeframe to complete).
2.3.3	Information on the timing, frequency and duration of the proposed avoidance, mitigation and management measures to be implemented.
2.3.4	Details of specific and measurable environmental outcomes to be achieved for relevant protected matters, including an assessment of the expected or predicted effectiveness of the proposed measures.
2.3.5	Any statutory or policy basis for the proposed measures, including reference to the SPRAT Database and relevant approved conservation advice, recovery plan or threat abatement plan, and a discussion on how the proposed measures are consistent with relevant plans.
2.3.6	Details of ongoing management and monitoring programs, including timing, to validate the effectiveness of proposed measures and demonstrate that environmental outcomes will be, or have been, achieved.

2.3.7	Details of tangible, on-ground corrective actions that will be implemented, including timing, in the event that monitoring programs indicate that the environmental outcomes have not been, or will not be, achieved.

2.4 Constraints Protocol

The PD must include a detailed Environmental constraints planning and field development protocol (constraints protocol) that outlines the process for ensuring the siting of gas field infrastructure involves:

- consideration of matters of national environmental significance (MNES) present;
- thorough investigation of avoidance and mitigation measures;
- where avoidance and mitigation are not possible, the consideration of necessary environmental offsets (refer to Section 5); and
- consideration of rehabilitation activities.

The constraints protocol must include constraints categories for MNES with consideration of their values (e.g. listing status), including proposed constraints, permitted activities and management measures under each category.

The preliminary documentation must address the following matters in addition to the general information listed above.

Information required	
2.4.1	Pre-disturbance surveys must be supervised by a suitably qualified person and undertaken in accordance with the department's survey guidelines in effect at the time of the survey or other equivalent survey methodology.
2.4.2	Include habitat mapping rules and specific survey requirements, informing the Constraints Protocol, to ensure that they contain complete habitat descriptions and survey requirements for each MNES, as outlined in relevant documents, including, but not limited to, SPRAT, conservation advice and recovery plans.
2.4.3	As vegetation communities/habitat are clarified and further defined within the project site, update the constraints protocol and any other relevant reports as appropriate.
2.4.4	Commitments must be made using unambiguous language, i.e. use 'will' and 'must' when committing to actions instead of 'where possible', 'where practicable', 'if there is flexibility', etc.
2.4.5	Include constraints commitments for all threatened species habitat and threatened ecological communities which may occur at the site of the proposed action. Where different maximum areas of impact are proposed on different habitat quality categories for a species or community, provide clear totals for extent of all impact and on each category.
2.4.6	Include mapping of constraints categories for MNES, including identified no go zones.

3. A WATER RESOURCE IN RELATION TO COAL SEAM GAS DEVELOPMENT AND LARGE COAL MINING DEVELOPMENT

3.1 Independent Expert Scientific Committee on Coal Seam Gas and Large Coal Mining Development

Under section 131AB of the EPBC Act, the Independent Expert Scientific Committee on Coal Seam Gas and Large Coal Mining Development (IESC), which is a statutory body under the EPBC Act, will provide advice to the Minister on the proposed action.

The *Information guidelines for IESC advice on coal seam gas and large coal mining development proposals* (IESC guidelines) provides guidance on the IESC's information needs and can be found at the following website: http://www.iesc.environment.gov.au/publications/information-guidelines-independent-expert-scientific-committee-advice-coal-seam-gas.

The information provided in the draft PD will be reviewed by the IESC. The draft PD must cross-reference the IESC checklist, found in the IESC guidelines, to ensure that the IESC's information guidance has been considered and addressed.

The IESC advice and the proponent's response to that advice, including any necessary additions and/or revisions to the draft PD, must be included in the PD package that will be published for public comment.

The IESC provides a number of publications and resources, including the IESC explanatory notes, which can be used as guidance material in drafting the PD. These publications can be found at the following website: http://iesc.environment.gov.au/publications. Where the approach to assessment of impacts and management of water resources differs from that outlined in the IESC guidance documentation, provide detailed reasoning and justification.

3.2 Joint Industry Framework

Please note the joint industry framework (JIF) will likely apply to the proposed action. The JIF can be found here: https://www.environment.gov.au/epbc/publications/coal-seam-gas-joint-industry-framework.

The JIF provides an outcomes and risk-based approach to groundwater impact management and outlines standard conditions for groundwater management of coal seam gas (CSG) developments in the Surat Basin. The JIF incorporates relevant management framework/s that must be followed by an approval holder if a risk threshold for a protected matter is predicted to be exceeded. The management of surface water and other impacts to a water resource unrelated to groundwater is outside the scope of the JIF.

3.3 The hydrology relevant to the proposed action area, including surface water and groundwater

Provide a regional overview of the proposed action area, including a description of the geological basin, coal resource, surface water catchments, groundwater systems and water dependent assets.

Describe any potential third-party users of water in areas potentially affected by the proposed action, including municipal, agricultural, industrial, recreational and environmental uses of water.

3.4 Impact assessment

The preliminary documentation must include an assessment of direct, indirect and consequential/facilitated impacts on water resources as a result of the proposed action and must be assessed in accordance with relevant departmental policies and guidelines.

The department considers the proposed action may result in, but is not limited to, the following impacts:

- chemical contamination;
- changes to hydrological regimes;
- changes to water quality;
- groundwater drawdown and associated impacts on:
    - groundwater dependent ecosystems; and
    - third-party bores;
- subsidence; and
- cumulative impacts with other CSG operations in the region.

The PD must include a description and assessment of the potential impacts to water resources, giving consideration to relevant departmental policies and guidelines, including the JIF and *Significant Impact Guidelines 1.3: Coal seam gas and large coal mining developments – impacts on water resources* (2013). These guidelines can be found at the following website: https://www.dcceew.gov.au/sites/default/files/documents/significant-impact-guidelines-1-3.pdf.

The PD must provide robust scientific information and supporting evidence for every assertion, assumption and/or conclusion made in the assessment of potential impacts, or lack of impacts, on water resources.

3.5 Avoiding, monitoring, mitigating and managing impacts

As discussed above (Section 2.3), the department expects avoidance and mitigation measures to be thoroughly investigated as a part of project design and planning, which must be supported by evidence to demonstrate likely success.

The PD must outline methodologies and commitments for ongoing monitoring, identifying, assessing (including incorporation of a risk assessment) and managing impacts to water resources for the life of the project. Methodologies should be specific to the particular water resource component.

The preliminary documentation must provide the general information requirements set out in section 2.3, as well as the following:

Groundwater	
3.5.7	The department considers that the referral provided insufficient evidence to conclude that there is a lack of hydraulic connectivity between the Quaternary alluvium and underlying geology, provide: • additional evidence that conclusively demonstrates a lack of connectivity between the Quaternary alluvium and the underlying geology; or • monitoring, mitigation and management measures relating the impacts of groundwater drawdown that may propagate into the Quaternary alluvium.
Groundwater dependent ecosystems	

3.5.8	If conclusive evidence that demonstrates that there is a lack of connectivity between the Quaternary alluvium and underlying geology is not provided, provide: • an analysis using the methods in *Information Guidelines Explanatory Note: Assessing groundwater-dependent ecosystems* (2019); of whether potential terrestrial GDEs in the project area, including Brigalow (*Acacia harpophylla* dominant and co-dominant), are reliant (partially or fully) on groundwater using direct techniques (e.g. plant water stable isotopes, and pre-dawn water stable isotopes); and/or • monitoring, mitigation and management measures relating the impacts of groundwater drawdown on GDEs. This should also include corrective actions and offsets if required.
Surface water	
3.5.9	Details of the monitoring, mitigation and management measures relating to impacts to surface water (e.g. chemical spill, waste leaching, or seepage into surface water features).
Cumulative impacts	
3.5.10	The proposed action is part of the broader development of CSG resources in the Surat Basin by the proponent and other developers. The PD must identify and assess the scale and extent of all the potential and likely cumulative impacts on water resources from the proposed action and other nearby resource projects. Where cumulative impacts are predicted, avoidance, mitigation and management measures must be proposed. This should also include corrective actions and offsets if required.

3.6 Chemical Risk

The PD must provide detail regarding the chemicals to be used during drilling and/or extraction operations and must include a chemical risk assessment framework (CRAF) that details how the risk of adverse impacts on protected matters posed by chemicals will be assessed and managed for the duration of this approval.

The CRAF must include, but is not limited to:

a) Details of how the risks of adverse impacts on protected matters posed by chemicals will be assessed and managed consistent with best practice risk assessment methodology. These details must include:

~~a)~~b) the process lifecycle for chemicals;

~~b)~~c) how risk from geogenic chemicals in CSG produced water and recovered drilling fluids will be managed to prevent adverse impacts to protected matters; and

~~c)~~d) minimum mitigation and management measures to be undertaken as part of CSG operations.

2) Details of the criteria by which chemicals will be categorised, based on the properties of each chemical. Criteria must include, but not be limited to:

a) combined persistence, bioaccumulative and toxicity assessment;

b) chemical database of concern assessment; and

c) specific persistence, bioaccumulative and toxicity assessment.

3) Detail a risk assessment process for each chemical to determine risk to protected matters from the chemical's use. This process must:

a) identify the risk assessment requirements based on the chemical's category;

b) consider the chemical's intended use and function, and an estimation of the quantity of the chemical likely to be used, and at what concentration, in a typical year;

c) consider the likely environmental fate of the chemical; and

d) consider what, if any, mitigation and management measures are needed to prevent adverse impacts to protected matters from that chemical for the duration of this approval.

4) Details of the process by which risk assessments for low-risk chemicals will be peer reviewed by an independent chemical risk assessment expert. This process must:

a) consider any checklists completed by the independent chemical risk assessment expert, to demonstrate that risks have been adequately assessed; and

b) include provision of a signed and dated statement from the independent chemical risk assessment expert confirming that the chemical has been correctly categorised.

5) Details of the process for recording each chemical's risk assessment in a register on the approval holder's website and for the provision of each chemical's risk assessment to the department.

6) Details of a process to monitor and report on the implementation of any mitigation and management measures undertaken during use and handling of chemicals, to demonstrate no adverse impacts to protected matters.

7) Details of the process by which information in the risk assessments will be adaptively used to address any accidental release of a chemical to prevent adverse impacts to protected matters.

4. REHABILITATION REQUIREMENTS

Where relevant to MNES, the following information regarding rehabilitation must be included in the PD.

Information required	
4.1	The details of any rehabilitation activities proposed to be undertaken, including any activities required through other Commonwealth, State and/or local government approvals. All commitments must be drafted using committal language (e.g. 'will' and 'must') when describing the proposed activities.
4.2	The proposed final landform, including rehabilitation completion criteria, and its relation to the pre-disturbance vegetation community. Include an assessment of the expected or predicted effectiveness of the proposed rehabilitation activities.
4.3	Information on the timing, frequency and duration of proposed rehabilitation activities to be implemented, including anticipated time to completion.
4.4	Details of ongoing management and monitoring programs, including timing, to validate the effectiveness of proposed rehabilitation activities and demonstrate that completion criteria will be, or have been, achieved.
4.5	Details of tangible, on-ground corrective actions that will be implemented, including timing, in the event that monitoring programs indicate that the completion criteria have not been, or will not be, achieved.

5. OFFSETS

Background

Environmental offsets are measures that compensate for the residual significant impacts of an action on the environment. Offsets provide environmental benefits to counterbalance the impacts that remain after consideration of avoidance and mitigation measures. Offsets do not reduce the impacts of an action and are not intended to make proposals with unacceptable impacts acceptable. It is important to consider environmental offsets early in the assessment process. Correspondence with the department regarding offsetting is highly encouraged. The department's *EPBC Act Environmental Offsets Policy* (2012) (Offsets Policy) is available at: www.environment.gov.au/epbc/publications/epbc-act-environmental-offsets-policy.

Where residual significant impacts are likely, include a draft Offset Strategy (OS) or a draft Offset Management Plan (OMP) as an appendix in the preliminary documentation for assessment and approval. If an offset area has been nominated, then provide an OMP. If not, provide an OS. Please note, if the proposed action is likely to have residual significant impacts, the department is likely to recommend to the Minister (or delegate) that the conditions of approval require the environmental offset/s or the OMP be approved and implemented prior to the commencement of the proposed action.

Information required	
5.1	An assessment of the likelihood of residual significant impacts occurring on relevant protected matters, after avoidance, mitigation and management measures have been applied.
5.2	A summary of the proposed environmental offset and key commitments to achieve a conservation gain for each protected matter.
5.3	If an offset area has not been nominated, include a draft OS as an appendix to the preliminary documentation. The draft OS must meet the information requirements set out in Appendix B.1.
5.4	Where offset area/s have been nominated, include a draft OMP as an appendix to the preliminary documentation. The draft OMP must meet the information requirements set out in Appendix B.2, and must be prepared by a suitably qualified ecologist and in accordance with the department's *Environmental Management Plan Guidelines* (2014), available at: www.environment.gov.au/epbc/publications/environmental-management-plan-guidelines.

6. ECOLOGICALLY SUSTAINABLE DEVELOPMENT (ESD)

Information required	
6.1	A description of how the proposed action meets the principles of ESD, as defined in section 3A of the EPBC Act. The following principles are ***principles of ecologically sustainable development***: • decision making processes should effectively integrate both long term and short term economic, environmental, social and equitable considerations; • if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation; • the principle of inter-generational equity—that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations; • the conservation of biological diversity and ecological integrity should be a fundamental consideration in decision making; • improved valuation, pricing and incentive mechanisms should be promoted.

7. ECONOMIC AND SOCIAL MATTERS

Information required	
7.1	An analysis of the economic and social impacts of the action, both positive and negative.
7.2	Details of any public consultation activities undertaken and their outcomes.

7.3	Details of any consultation with Indigenous stakeholders. **Indigenous engagement** Identify existing or potential native title rights and interests, including any areas and objects that are of particular significance to Indigenous peoples and communities, possibly impacted by the proposed action and the potential for managing those impacts. Describe any Indigenous consultation that has been undertaken, or will be undertaken, in relation to the proposed action and their outcomes. The department considers that best practice consultation, in accordance with *The Interim Engaging with First Nations People and Communities on Assessments and Approvals under Environment Protection and Biodiversity Conservation Act 1999 (interim guidance)* (2023) includes: • ensuring cultural safety; • building and maintaining trust; • engaging early and often; • negotiating suitable timeframes; and • negotiating suitable submission formats. Describe any state requirements for approval or conditions that apply, or that the proponent reasonably believes are likely to apply, to the proposed action with regards to Indigenous peoples and communities.
7.4	Projected economic costs and benefits of the project, including the basis for their estimate through cost/benefit analysis or similar studies.
7.5	Employment opportunities expected to be generated by the project (including construction and operational phases).

8. ENVIRONMENTAL RECORD OF THE PERSON PROPOSING TO TAKE THE ACTION

Information required	
8.1	Include details of any past or present proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against: • the person proposing to take the action; • for an action for which a person has applied for a permit, the person making the application; • if the person is a body corporate—the history of its executive officers in relation to environmental matters; and • if the person is a body corporate that is a subsidiary of another body or company (the parent body)—the history in relation to environmental matters of the parent body and its executive officers.

APPENDIX A: Preliminary documentation content, style and formatting requirements

A1. Content requirements	
A1.1	Be a stand-alone document containing sufficient information to avoid the need to search out previous or supplementary reports.
A1.2	Enable interested stakeholders and the Minister to easily understand the consequences of the project on matters of national environmental significance (MNES).
A1.3	Be written so that any conclusions reached can be independently assessed. Include all key claims, findings, proposals and undertakings in the main document.
A1.4	Refer to all relevant standards, policies and other guidance material published by the department. Any instances where published guidance is not followed must be justified. Where no Commonwealth standards exist, state government and industry standards may be useful.
A1.5	Include the names, roles and qualifications (where relevant) of all persons involved in preparing the preliminary documentation.
A1.6	Include a copy of this request for information and a cross-reference table indicating where the information fulfilling this request is included in the preliminary documentation (e.g. Section 4.2.2 and Appendix A, Chapter 2.1).
A1.7	The preliminary documentation must state the following for all information provided: • The source and date of the information; • How the reliability of the information was tested; • The uncertainties (if any) in the information; • The guidelines, plans, and/or policies considered.
A2. Format and style requirements	
A2.1	Be in a suitable format to be published in hardcopy (A4 or A3 size, with maps and diagrams in A4 or A3 size and in colour) and published in electronic format (e.g. MSWord or PDF) on the internet.
A2.2	Include detailed technical information, studies or investigations necessary to support the information in the stand-alone document as appendices.
A2.3	Be objective, clear, succinct, avoid technical jargon and, where appropriate, be supported by maps, plans, diagrams, data or other descriptive detail.

A2.4	Reference all sources using the Harvard standard of referencing. Ensure that other supporting documents (e.g. academic studies, regulatory standards) are publicly accessible, with electronic links provided where possible.
A2.5	Redact the names and contact details of departmental officers.
A2.6	Not contain any commercial-in-confidence markings. If the preliminary documentation contains sensitive information, please discuss this with the assessment officer.
A3. Ecological data provision	
A3.1	The preliminary documentation must include an appendix of occurrence records (both sightings and evidence of presence) for all listed threatened and migratory species identified during field surveys for the proposed action. This data may be used by the department to update the relevant species distribution models that underpin the publicly available Protected Matters Search Tool (PMST).
A3.2	The species occurrence records must be provided in accordance with the department's *Guidelines for biological survey and mapped data* (2018) using the department's Species observation data template. Sensitive ecological data must be identified and treated in accordance with the department's *Sensitive Ecological Data – Access and Management Policy V1.0* (2016) or subsequent revision.

APPENDIX B: Information Requirements for EPBC Act Offset Proposals

Guidance on environmental offsets is available on the department's website at: https://www.dcceew.gov.au/environment/epbc/advice-for-complying-with-the-epbc-act/environmental-offsets-under-epbc/environmental-offsets-guidance.

B1. Minimum Requirements for a draft Offset Strategy: An Offset Strategy (OS) is like a proof-of-concept for an offset proposal. It demonstrates suitability and feasibility and commits to a timeframe. When impacts and offsets are well understood and suitability of the proposed offset is high, an OS may not be required.	
B1.1	Details of the residual impacts to protected matters as a result of the proposed action. This must include the methodology, with justification and supporting evidence, used to inform the inputs of the Offsets Assessment Guide in relation to the impact site for each relevant protected matter, including: • total area of habitat (in hectares); and • habitat quality (e.g. using the Queensland Government Guide to determining terrestrial habitat quality: A toolkit for assessing land based offsets under the Queensland Environmental Offsets Policy [2020]). A methodology that is suitable for the species in question must be used to assess habitat quality (i.e. consistent with departmental guidance or supported by literature), noting the same scoring mechanism must be used at both the impact site and the offset site. Please note, if using the above *Guide to determining terrestrial habitat quality*, the 'absence of threats' component of the score must only contain indicators that reflect the current habitat quality of the site (e.g. presence of pest species). Indicators that instead relate to a site's potential future condition must be excluded (e.g. risk of clearing or development). It is important to avoid confounding the presence of threats at a site *that might affect the future state of a site*, with those affecting its *current* state. These threats are appropriately dealt with in consideration of future risk of loss in the Offsets Assessment Guide and so should not be included in the score for current habitat condition.
B1.2	Details of the potential offset area/s (including a map) to compensate for the residual impacts of the proposed action on relevant protected matters.
B1.3	Specific details of the nature of the conservation gain to be achieved for relevant protected matters, including the creation, restoration and revegetation of habitat in the proposed offset area/s.
B1.4	Details, with supporting evidence, of how the environmental offset/s meets the requirements of the *EPBC Act Environmental Offsets Policy* (2012) (Offsets Policy), available at: www.environment.gov.au/epbc/publications/epbc-act-environmental-offsets-policy.
B1.5	The methodology, with justification and supporting evidence, used to inform the inputs of the Offsets Assessment Guide in relation to each potential offset area/s for each relevant protected matter, including: • time over which loss is averted (max. 20 years);

	• time until ecological benefit; • risk of loss (%) without offset; • risk of loss (%) with offset; and • confidence in result (%). Please note, risk of loss should not include consideration of stochastic events (e.g. bushfires), activities that contribute to changes in habitat quality scores or impacts that would otherwise require an offset under any relevant legislation.
B1.6	Evidence that the relevant protected matter, and/or their habitat, can be present in the potential offset area/s.
B1.7	Information about how the potential offset area/s provides connectivity with other relevant habitats and biodiversity corridors.
B1.8	Details and execution timing of the mechanism to legally secure the environmental offset/s (under Queensland legislation or equivalent) to provide enduring protection for the potential offset area/s against development incompatible with conservation.
B2. Minimum Requirements for a draft Offset Management Plan: The Offset Management Plan (OMP) outlines what needs to be done to manage an offset site once it is in place, such as setting milestones, monitoring, and reporting. It should also include a risk assessment and identify triggers for adaptive management. All direct offsets require an OMP.	
B2.1	Details of the residual impacts to protected matters as a result of the proposed action. This must include the area/s of habitat (in hectares) and its quality (see Section B2.6 below) within the impact site for which the offset/s is to compensate (i.e. the quantum of impact).
B2.2	A description of the offset area/s, including location, size, condition, environmental values present and surrounding land uses.
B2.3	Maps and shapefiles to clearly define the location and boundaries of the offset area/s, accompanied by the offset attributes (e.g. physical address of the offset area/s, coordinates of the boundary points in decimal degrees, the relevant protected matter that the environmental offset/s compensates for, and the size of the environmental offset/s in hectares).
B2.4	Baseline data and other supporting evidence that documents the presence of the relevant protected matter/s within the offset area/s.
B2.5	Details, with supporting evidence, to demonstrate how the environmental offset/s compensate for residual significant impacts of the proposed action on relevant protected matters, and/or their habitat, in accordance with the principles of the Offsets Policy and all requirements of the Offsets Assessment Guide, including: • time over which loss is averted (max. 20 years); • time until ecological benefit; • risk of loss (%) without offset;

	• risk of loss (%) with offset; and • confidence in result (%). Please note, risk of loss should not include consideration of stochastic events (e.g. bushfires), activities that contribute to changes in habitat quality scores or impacts that would otherwise require an offset under any relevant legislation.
B2.6	An assessment of the habitat quality for the offset area/s (e.g. using the Queensland Government *Guide to determining terrestrial habitat quality: A toolkit for assessing land based offsets under the Queensland Environmental Offsets Policy* [2020]). A methodology that is suitable for the species in question must be used to assess habitat quality (i.e. consistent with departmental guidance or supported by literature), noting the same scoring mechanism must be used at both the impact site and the offset site. Please note, if using the above *Guide to determining terrestrial habitat quality*, the 'absence of threats' component of a score must only contain indicators that reflect the current habitat quality of the site (e.g. presence of pest species). Indicators that instead relate to a site's potential future condition must be excluded (e.g. risk of clearing or development). It is important to avoid confounding the presence of threats at a site *that might affect the future state of a site*, with those affecting its *current* state. These risks are appropriately dealt with in consideration of future risk of loss in the Offsets Assessment Guide and so should not be included in the score for current habitat condition.
B2.7	Details of how the offset area/s will provide connectivity with other habitats and biodiversity corridors and/or will contribute to a larger strategic offset for the relevant protected matter.
B2.8	Specific, committal and measurable environmental outcomes that detail the nature of the conservation gain to be achieved for each protected matter, including the creation, restoration and revegetation of habitat in the proposed offset area/s.
B2.9	Specific offset completion criteria derived from the offset area habitat quality to demonstrate the improvement in the quality of habitat in the offset area/s over a 20-year period.
B2.10	Details of the management measures, and timeframes for implementation, to be carried out to meet the offset completion criteria. All proposed management measures must be written using committed language (e.g. 'will' and 'must').
B2.11	Interim milestones that set targets at 5-yearly intervals for progress towards achieving the offset completion criteria.
B2.12	Details of the nature, timing and frequency of monitoring to inform progress against achieving the 5-yearly interim milestones (the frequency of monitoring must be sufficient to track progress towards each set of milestones, and sufficient to determine whether the offset area/s are likely to achieve those milestones in adequate time to implement all necessary corrective actions).

B2.13	Proposed timing for the submission of monitoring reports which provide evidence demonstrating whether the interim milestones have been achieved.
B2.14	Details of the tangible, on-ground corrective actions, and timeframes for implementation, if monitoring activities indicate an interim milestone has not been achieved, including an approach to monitoring the effectiveness of the corrective actions. All proposed corrective actions must be written using committed language (e.g. 'will' and 'must').
B2.15	Evidence of how the management actions and corrective actions take into account relevant approved conservation advices and are consistent with relevant recovery plans and threat abatement plans.
B2.16	Risk analysis and a risk management and mitigation strategy for all risks to the successful implementation of the OMP and timely achievement of the offset completion criteria, including a rating of all initial and post-mitigation residual risks in accordance with a risk assessment matrix.
B2.17	Details and execution timing of the mechanism to legally secure the proposed offset area/s, such that legal security remains in force over the offset area/s for at least 20 years to provide enduring protection for the offset area/s against development incompatible with conservation.