



Bowen - EPBC Approval 2012/6377 Annual Compliance Report 2022/2023

Bowen Gas Project

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Contents

1.	Purpose	3
2.	Description of activities	3
2.1	Approved activities	3
2.2	Current activities	3
3.	Approval conditions	3
3.1	Compliance table	3
3.2	Referenced management plans	4
4.	Non-compliance	4
5.	New environmental risks	4
6.	Reconciliation of impacts against approval limits for listed threatened species	4
7.	Declaration of Accuracy	5
8.	Document Administration	6
	Appendix A: EPBC Approval 2012/6377 Conditions Compliance Table	8

1. Purpose

This document reports Arrow's annual compliance with EPBC¹ Approval 2012/6377 (EPBC Approval) for the year of 14 February 2022 to 13 February 2023.

2. Description of activities

2.1 Approved activities

EPBC Number – 2012/6377

Arrow Bowen Gas Project (BGP)

Approval Holder : Arrow Energy Pty Ltd

ACN : 73 078 521 936

Approved Action: To develop, operate and decommission a coal seam gas field in the Bowen Basin, Queensland referred under the EPBC Act on 9 May 2012; and as described in the Arrow Bowen Gas Project Environmental Impact Statement (March 2013) and Supplementary Report (May 2014).

Action Commencement Date: 14 February 2019

Decision Date: 26 September 2019 (variation to EPBC Approval conditions)

Location of Project: Bowen Basin

Person Accepting responsibility for the report: Godson Njoku, Chief Executive Officer

Dates for Reporting period: 14 February 2022 to 13 February 2023

Date of Preparation of report: 8 May 2023

2.2 Current activities

No work packages associated with gas production were undertaken during the reporting period.

3. Approval conditions

3.1 Compliance table

Refer to Appendix A for the EPBC Approval Conditions Compliance Table, which demonstrates that all EPBC Approval 2012/6377 conditions have been considered and addressed and noting compliance with these conditions.

Records substantiating all activities associated with or relevant to approval conditions are stored in Arrow's file directories.

¹ Environment Protection and Biodiversity Conservation Act 1999 (EPBC)

3.2 Referenced management plans

The following management plans required under the EPBC Approval conditions are available on Arrows website.

- Bowen Gas Project EPBC Species Impact Management Plan, October 2018 (SIMP)
- Bowen Gas Project Phase 1 Offset Strategy, October 2018 (Offset Strategy)
- Bowen Gas Project CSG Groundwater Monitoring and Management Plan Project Stage 1, October 2019 (GMMP)

At the time of writing, a revised draft of the Offset Area Management Plan (OAMP) is currently being prepared for assessment by the Department of Climate Change, Energy, the Environment and Water (DCCEEW).

4. Non-compliance

Nil

5. New environmental risks

Nil

6. Reconciliation of impacts against approval limits for listed threatened species

In accordance with Condition 30, Item (a), Table 1 below provides a *reconciliation of actual impacts against whole of project maximum disturbance limits for EPBC listed threatened species and communities listed in Table 1* [of EPBC Approval 2012/6377].

The 'Project Phase 1 proposed disturbance' limits presented in the table below are those included in the approved Offset Strategy.

As discussed in Section 2.2, there were no disturbances associated with the Approved Action during the current reporting period and therefore no impacts to the values listed in Table 1. The cumulative impacts presented in Table 1 reflect recorded disturbance areas from a previous annual report dated 27 April 2022.

Table 1: Reconciliation of actual impacts against project maximum disturbance limits

Threatened Species	Whole of project approved limits (ha)	Project Phase 1 max. disturbance (ha)	Actual Cumulative impact total to date (ha)*
Black Ironbox (<i>Eucalyptus raveretiana</i>)	258.32	21.33	0
Bluegrass (<i>Dichanthium setosum</i>)	809.59	249.84	3.7^
King Bluegrass (<i>Dichanthium queenslandicum</i>)	1,161.23	429.36	0
Ornamental Snake (<i>Denisonia maculata</i>)	1,030.31	296.2	18.4
Squatter Pigeon (<i>Geophaps scripta scripta</i>)	1,415.44	313.1	20.9
Red Goshawk (<i>Erythroriorchis radiatus</i>)	187.14	49.4	4.4
Koala (<i>Phascolarctos cinereus</i>) (combined populations of Queensland, New South Wales and the Australian Capital Territory)	2,466.04	376.59	3.8
South-eastern long-eared bat (<i>Nyctophilus corbeni</i>)	2,282.57	618.12	0
Large-eared Pied Bat (<i>Chalinolobus dwyeri</i>)	1,451.44	723.67	0
<u>Threatened Ecological Communities</u>			
Brigalow (<i>Acacia harpophylla</i> dominant and co- dominant)	781.16	283.92	2.94
Weeping Myall Woodlands	198.48	79.68	0
Natural Grasslands of the Queensland Central Highlands and the northern Fitzroy Basin	871.10	278.4	0
Semi-evergreen vine thickets of the Brigalow Belt (North and South) and Nandewar Bioregions	107.42	97.6	0

*Threatened species areas based upon Regional Ecosystem mapping version 10.

TEC areas based upon Regional Ecosystem mapping version 11.

^Area based conservatively on potential habitat mapping. *D. setosum* has not been observed within the approval area.

7. Declaration of Accuracy

In making this declaration, I am aware that sections 490 and 491 of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed : _____

Full name: Godson Njoku

Position: Chief Executive Officer

Organisation: Arrow Energy Pty Ltd

ACN: 73 078 521 936

Date: _____

Appendix A: EPBC Approval 2012/6377 Conditions Compliance Table

2Condition	Description	Compliant/non-compliant or not applicable	Comments
1	The Minister may determine that a plan, strategy or program approved by the Queensland Government satisfies a plan, strategy or program required under these conditions.	Not applicable	
2	For the purpose of the action, the approval holder must not take any action outside the Authorities to Prospect (ATPs) 1103, 1031, 1025, 749, 742 and 759, shown as the Bowen Gas Project Tenements at Attachment A.	Compliant	All actions to date have occurred on Petroleum Lease 486 (PL486), formerly part of tenure ATP1103.
3	The action is limited to a maximum of 4,000 coal seam gas production wells and associated infrastructure.	Compliant	No new production wells were drilled during the reporting period. Therefore the number of wells constructed under the EPBC Approval 2012/6377 remains at 20.
4	The maximum disturbance limits in Table 1 apply to the action to protect those EPBC listed species and communities (identified in Table 1) within the project area. The approval holder must not exceed these maximum disturbance limits.	Compliant	Table 1 of this EPBC 2012/6377 Annual Compliance Report reconciles the actual impact with the maximum disturbance limits and confirms that Arrow has not exceeded these limits.
5	To protect those EPBC listed species and communities (identified in Table 2) within the project area the maximum disturbance limits in Table 2 apply to Project Phase 1. The approval holder must not exceed these maximum disturbance limits for Project Phase 1.	Compliant	Table 1 of this EPBC 2012/6377 Annual Compliance Report reconciles the actual impact of Project Phase 1 with the Project Phase 1 maximum disturbance limits and confirms that Arrow has not exceeded these limits.
6	The approval holder must undertake pre-clearance surveys of proposed disturbance areas.	Compliant	No new disturbances occurred during the reporting period. Pre-clearance surveys of disturbance during previous reporting period were undertaken in accordance with Arrow's Ecological Impact Assessment Procedure (ORG-ARW-HSM-PRO-00070).

2Condition	Description	Compliant/non-compliant or not applicable	Comments
7	Pre-clearance 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 survey methodology endorsed by the Department in writing.	Compliant	No new disturbances occurred during the reporting period. All pre-clearance surveys in previous reporting years were undertaken by a suitably qualified person. The Department's survey guidelines were followed and are reflected in Arrow's Ecological Impact Assessment Procedure (ORG-ARW-HSM-PRO-00070).
8	A report of the outcomes of pre-clearance surveys must be included in annual reporting required by condition 30.	Compliant	No new disturbances occurred during the reporting period.
9	<p>Prior to the commencement of Project Phase 1, the approval holder must prepare and submit an EPBC Species Impact Management Plan (EPBC SIMP) for the Minister's written approval. The EPBC SIMP must include:</p> <ul style="list-style-type: none"> a) measures that will be taken to avoid, mitigate and manage impacts to EPBC listed threatened species and their habitat during clearance of vegetation, including the involvement of a suitably qualified person at all times during clearance of vegetation; b) measures that will be taken to avoid, mitigate and manage impacts to EPBC listed threatened species and their habitat and to EPBC communities during construction, operation and decommissioning of the action; c) a monitoring program to determine the success of mitigation and management measures to ensure adaptive management for the duration of this approval; d) a discussion of relevant conservation advice, recovery plans and threat abatement plans and how measures proposed in the EPBC Species Impact Management Plan are consistent with the measures in these documents; and e) details of how the approval holder has addressed any residual significant impacts to any EPBC listed threatened species and its habitat and/or EPBC communities not identified in Table 1, to be offset in accordance with the EPBC Act Environmental Offsets Policy. 	Compliant	Arrow prepared and had approved by the minister an EPBC SIMP for Project Phase 1 (approval date 15 October 2018) which was prior to the commencement of Project Phase 1 on 14 February 2019.

2Condition	Description	Compliant/non-compliant or not applicable	Comments
10	The approval holder cannot commence Project Phase 1 until an EPBC SIMP has been approved by the Minister in writing. The approved EPBC SIMP must be implemented by the approval holder.	Compliant	Arrow prepared and had approved by the Minister an EPBC SIMP for Project Phase 1 (approval date 15 October 2018) which was prior to the commencement of Project Phase 1 on 14 February 2019. The approved EPBC SIMP is being implemented.
11	The approval holder must ensure that environmental offsets comply with the principles of the EPBC Act Environmental Offsets Policy. If the approval holder has provided an offset in respect of impacts predicted for a stage of the project which subsequently are not realised, such parts of the offset in excess of the obligation for that stage can be applied towards offsets required for the impacts of subsequent Project Stages.	Compliant	Arrow is currently negotiating to secure offset properties that comply with the principles of the EPBC Act Environmental Offsets Policy. To date, Arrow has secured one offset property and is currently negotiating a second. It is anticipated that these properties will accommodate required offsets for all project stages associated with Project Phase 1.
12	The approval holder may carry out the action in stages. The approval holder must deliver environmental offsets for each Project Phase related to the residual impacts of each respective Project Phase on EPBC listed threatened species and communities.	Not applicable	Arrow has secured one offset property and is currently negotiating a second offset property to deliver environmental offsets for Project Phase 1 related to the residual impacts of Project Phase 1 on EPBC listed threatened species and communities.
13	The Offset Strategy may be prepared and submitted to the Minister for approval in stages. Each stage of the Offset Strategy must provide information in respect of the next Project Phase to commence and all earlier Project Phases. A Project Phase must not commence until an Offsets Strategy addressing offset obligations for that Project Phase has been approved by the Minister.	Compliant	Arrow submitted an Offset Strategy for Project Phase 1 to the Minister which was approved on 12 October 2018. Arrow has not commenced any other Project Phases.

2Condition	Description	Compliant/non-compliant or not applicable	Comments
14	<p>The Offset Strategy must include:</p> <ul style="list-style-type: none"> a) a strategy to secure the minimum offsets proposed for the residual significant impacts for the next Project Phase; b) a reconciliation of impacts predicted in the next Project Phase and actual disturbance in earlier Project Phases against the maximum disturbance limits set out in Table 1; c) a process to offset, in accordance with the EPBC Act Environmental Offsets Policy, any significant impact for the next Project Phase to any EPBC listed threatened species or EPBC community not identified in Table 1; d) a program to monitor and report on the effectiveness of these measures, and progress against the performance and completion criteria; e) a description of potential risks to the successful implementation of the plan, and a description of the contingency measures that would be implemented to mitigate against these risks; f) a timeline for when actions identified in the Offset Strategy will be implemented for each offset area; and g) the proposed legal mechanism for securing the offset. 	Compliant	The approved Offsets Strategy included all aspects in Condition 14.
15	The approval holder must not commence Project Phase 1 until the Offset Strategy has been approved by the Minister in writing. The approved Offset Strategy must be implemented by the approval holder.	Compliant	<p>Arrow submitted an Offset Strategy for Project Phase 1 to the Minister which was approved on 12 October 2018. Project Phase 1 commenced in February 2019, after approval in writing was received from the Minister. The approved Offset Strategy is being implemented.</p>

2Condition	Description	Compliant/non-compliant or not applicable	Comments
16	<p>Offsets for Project Phases must be in accordance with the mechanism identified in the Offset Strategy and must be registered and legally secured in accordance with Queensland legislation prior to commencement of any subsequent Project Phase.</p>	Not applicable	<p>Arrow has not commenced any Project Phases subsequent to Project Phase 1. A revised OAMP is currently being drafted for assessment by DCCEEW for approval. The OAMP contains detail on the proposed offset property and once approved the property will be secured with a Voluntary Declaration as per the Offset Strategy. A Call Option was agreed to with the owners of the offset property to secure interests in a suitable offset area in November 2022.</p>
17	<p>At least 3 months prior to the commencement of any Project Phase after Project Phase 1, the approval holder must submit a revised Offset Strategy required at conditions 13 and 14 for approval by the Minister. The updated Offset Strategy must include:</p> <ul style="list-style-type: none"> a) a strategy to secure the minimum offsets proposed for the residual significant impacts to the EPBC listed species and communities for the next Project Phase; b) a map of the location of each EPBC listed threatened species and its habitat and EPBC Community in relation to infrastructure for the next Project Phase; c) the information required for the Offset Strategy Conditions 14a to 14 g for the next Project Phase; d) demonstration of how any proposed offset builds on offsets already secured and will contribute to a larger strategic criteria for whole of project impacts; evaluating the management of offset; e) performance and completion criteria for evaluating the management of offset areas. 	Not applicable	<p>Arrow has not commenced any Project Phases subsequent to Project Phase 1.</p>

2Condition	Description	Compliant/non-compliant or not applicable	Comments
17A	<p>Within 12 months of project commencement or the Minister approving a version of the Offset Strategy for a Project Phase, the approval holder must submit for approval of the Minister an OAMP which includes:</p> <ul style="list-style-type: none"> a) a description of the management measures that will be implemented for the protection of EPBC listed threatened species and communities in each offset area, b) details of how the proposed offsets and OAMP meet the requirements of the EPBC Act Environmental Offsets Policy, c) a field validation survey and baseline description of the current condition (prior to any management activities) of the offset areas, including existing vegetation, d) a description and map (including shapefiles) to clearly define the location and boundaries of the offset areas, accompanied by the offset attributes, e) information about how the offset areas provide connectivity with other relevant habitats and biodiversity corridors including a map depicting the offset areas in relation to other habitats and biodiversity corridors, f) details of how proposed management measures take into account relevant approved conservation advices and are consistent with the measures contained in relevant recovery plans and threat abatement plans, g) completion criteria and performance targets for evaluating the effectiveness of OAMP implementation, criteria for triggering corrective actions (if necessary), h) a program to monitor, report on and review the effectiveness of the OAMP, i) a description of potential risks to the successful implementation of the offsets, and contingency measures that would be implemented to mitigate against these risks. 	Compliant	Arrow submitted an OAMP to DCCEEW for approval on 14 February 2020 (within 12 months of project commencement). This document is currently being revised for approval by DCCEEW.
17B	The approval holder must not commence the next Project Phase until the OAMP for the current Project Phase has been approved in writing by the Minister.	Not applicable	Arrow has not commenced any Project Phases subsequent to Project Phase 1.

2Condition	Description	Compliant/non-compliant or not applicable	Comments
18	Offsets for each Project Phase subsequent to Project Phase 1 must be registered and legally secured in accordance with Queensland legislation prior to commencement of the next Project Phase.	Not applicable	Arrow has not commenced any Project Phases subsequent to Project Phase 1 and is currently negotiating to secure offset properties for Project Phase 1. These will be secured and in place prior to the commencement of the next Project Phase. A Call Option was agreed to with the owners of the offset property to secure interests in a suitable offset area in November 2022.
19	The approval holder must not commence the next Project Phase until the Offset Management Plan, updated for that Project Phase, has been approved by the Minister in writing. The approved Offset Management Plan as updated for each Project Phase must be implemented by the approval holder.	Not applicable	Arrow has not commenced any Project Phases subsequent to Project Phase 1.
20	The approval holder must not discharge, irrigate or otherwise release CSG produced water, wastewater, stormwater or harvested water, into the Isaac River and its tributaries unless the discharge complies with the discharge criteria defined for the site and is in accordance with the requirements of an environmental authority issued under the <i>Environmental Protection Act 1994</i> (Qld) for the action.	Compliant	Arrow has not discharged any CSG produced water, wastewater, stormwater or harvested water into the Isaac River or its tributaries.
20A	The approval holder must carry out the action in Project Stages. Project Stage 1 must be carried out within the Bowen Gas Project tenements identified at Attachment B.	Compliant	Activities associated with Project Stage 1 were undertaken within PL486, which was formerly part of the tenements (ATP1103) identified within Attachment B.
21	<p>The approval holder must submit a Groundwater Management and Monitoring Plan (GMMP) for the written approval of the Minister who may seek the advice of an expert panel. The GMMP must contain:</p> <ul style="list-style-type: none"> a) details of a groundwater monitoring network for the measurement of impacts on water resources associated directly or indirectly with the action, including the ability to: <ul style="list-style-type: none"> i. provide for the early detection of any changes in the groundwater regime in terms of amplitude and frequency of fluctuations in water pressure, water level and water quality in groundwater systems and changes in connectivity with surface water; 	Compliant	The GMMP was approved by DCCEEW October 2019. The GMMP contains all parts of Condition 21.

2Condition	Description	Compliant/non-compliant or not applicable	Comments
	<ul style="list-style-type: none"> ii. monitor relevant formations to determine hydraulic connectivity and provide for early detection of impacts prior to reaching migration pathways to other formations (e.g. faults and areas of unconformities known to connect two or more formations); iii. monitor potential impacts on groundwater dependent ecosystems, including spring based and non-spring-based ecosystems, and provide for the early detection of impacts; iv. monitor changes to the project area groundwater balance; and v. monitor changes to water availability for water users and the environment. b) details of a baseline monitoring data acquisition program for the approved action; c) a rationale for the design of the monitoring network with respect to the nature of potential impacts and the location and occurrence of matters of national environmental significance; d) details of proposed early warning indicators, trigger thresholds and limits for detecting impacts on groundwater levels and a description of how and when these measures will be finalised and subsequently reviewed in accordance with the requirements of the Underground Water Impact Report; e) details of a risk-based exceedance response for the actions the approval holder will take, and the timeframes in which these actions will be undertaken, if early warning indicators and trigger threshold values are exceeded; f) details of the timeframe for a regular review of the GMMP in accordance with the requirements of the Underground Water Impact Report and subsequent updates of the GMMP, including to incorporate the outcomes of updates to the numerical groundwater model and water balance calculations; g) provisions to make monitoring results publicly available on the approval holder's website for the life of the project; and 		

2Condition	Description	Compliant/non-compliant or not applicable	Comments
	h) provisions to make monitoring data available to the Department and Queensland Government authorities (if requested) for inclusion in any cumulative impact assessment, regional water balance model, bioregional assessment or relevant research.		
22	The GMMP must be peer reviewed by a suitably qualified water resources expert/s approved by the Minister in writing. A peer review must be submitted to the Minister together with the GMMP and a statement from the suitably qualified water resources expert/s stating that they carried out the peer review and endorse the findings and the content of the GMMP.	Compliant	The Approved GMMP was peer reviewed by a third party, who is a suitably qualified water resources expert, on 14 March 2019 and the review as well as a statement from the that third party were submitted to the Minister prior to approval of the GMMP. The Minister approved the suitably qualified water resources expert on 7 July 2015.
23	The approval holder must not commence the extraction of water or coal seam gas for Project Stage 1 until the GMMP has been approved by the Minister in writing. The approved GMMP must be implemented by the approval holder.	Compliant	The GMMP was approved by DCCEEW on 24 October 2019. Arrow is implementing the GMMP, with an annual monitoring report released during the reporting period (13 May 2022) and published on Arrow's website.
23A	The approval holder may undertake subsequent Project Stages which must not exceed 4000 coal seam gas wells and must be located within the Bowen Gas Project tenements in Attachment A.	Not applicable	Arrow has not commenced any Project Stages subsequent to Project Stage 1.
23B	The approval holder must update the approved GMMP accordingly to cover the additional Project Stage(s) addressing matters in condition 21B(a) to (h) above and submit the updated GMMP for approval.	Not applicable	Arrow has not commenced any Project Stages subsequent to Project Stage 1.
23C	Each update of the approved GMMP prepared for a further Project Stage must be peer reviewed by a suitably qualified water resources expert/s approved by the Minister in writing. A peer review must be submitted to the Minister together with the updated GMMP and a statement from the suitably qualified water resources expert/s stating that they carried out the peer review and endorse the findings and the content of the updated GMMP.	Not applicable	Arrow has not commenced any Project Stages subsequent to Project Stage 1. Accordingly, Arrow has not needed to update the GMMP and therefore has not triggered further peer review.
23D	The approval holder must not commence the extraction of water or coal seam gas from wells covered by a further Project Stage until the updated GMMP has been approved by the Minister in writing. The approved updated GMMP must be implemented by the approval holder	Not applicable	Arrow has not commenced any Project Stages subsequent to Project Stage 1. Accordingly, Arrow has not needed to update the GMMP.

2Condition	Description	Compliant/non-compliant or not applicable	Comments
24	The Minister may direct in writing that the approval holder cease water or gas extraction and/or water discharge or use if an early warning indicator, trigger threshold or limit is exceeded, and if the Minister is not satisfied that the action proposed or taken by the approval holder will remedy the situation. The Minister may direct the approval holder to implement alternative action at the expense of the approval holder.	Not applicable	Arrow has not received any such direction from the Minister.
25	If the Minister has directed in writing that the approval holder must cease water or gas extraction and/or water discharge or use pursuant to condition 24 the approval holder must not recommence such activities until the Minister has given approval in writing for the recommencement of those activities. Approval to recommence activities may be subject to conditions that the Minister considers reasonable.	Not applicable	Arrow has not received any such direction from the Minister.
26	In the event that hydraulic fracturing is required, no more than 1,000 of the total coal seam gas production wells may be hydraulically fractured.	Compliant	Hydraulic fracturing has not been undertaken since the project commenced.
27	The approval holder must ensure that gas wells are constructed, operated and decommissioned in accordance with best practice principles in the Queensland Code of Practice for Construction and Abandoning CSG wells.	Compliant	Wells installed since commencement of the Action are operated in accordance with the Queensland Code of Practice for the Construction and Abandonment of Petroleum Wells and Associated Bores in Queensland. Noting that there are three wells where steel casing is set over a mineable seam and that Arrow has an agreement in place with the overlapping tenure holder as to how to manage these occurrences.
28	Within 20 business days after the commencement of the action, the approval holder must advise the Department in writing of the actual date of commencement.	Compliant	On 7 March 2019, the Department was advised that Project Phase 1 commenced on 14 February 2019.
29	The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the management plans, reports or strategies required by this approval, and make them available upon request to the Department. The annual report (condition 30) must state all confirmed cases of non-compliance along with details of any remedial actions. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media.	Compliant	Nil

2Condition	Description	Compliant/non-compliant or not applicable	Comments
30	<p>Within three months of every 12 month anniversary of the commencement of the action, the approval holder must publish a report on its website for the life of the approval outlining how they have been compliant with the conditions of this approval over the previous 12 months, including the implementation of any management plans, strategies or programs as specified in the conditions. The approval holder must also provide in this report:</p> <ul style="list-style-type: none"> a) a reconciliation of actual impacts against whole of project maximum disturbance limits for EPBC listed threatened species and communities listed in Table 1; b) the number and spatial distribution of boreholes where hydraulic fracturing is expected to occur or has occurred; and c) details of constituent components of hydraulic fracturing agents used and any other reinjected fluid(s), their toxicity as individual substances and as total effluent toxicity and ecotoxicity. 	Compliant	This report has been published to provide information required by Condition 30 for the current reporting period. The report was published within the three-month timeframe.
31	The approval holder must provide documentary evidence to the Department providing proof of the date of publication of any non-compliance with any of the conditions of this approval at the same time as the report required at condition 30 is published.	Not applicable	No non-compliances have occurred during the reporting period.
32	<p>The approval holder must notify the Department in writing of potential non-compliance with any condition of this approval as soon as practical and in any event within ten business days of becoming aware of the potential non-compliance. The notice provided to the Department under this condition must specify:</p> <ul style="list-style-type: none"> a) the condition which the approval holder has potentially breached; b) the nature of the potential non-compliance; c) when and how the approval holder became aware of the non-compliance; d) how the non-compliance will affect the anticipated impacts of the approved action, in particular how the non-compliance will affect the impacts on the matters of national environmental significance; e) the measures the approval holder will take to address the impacts of the non-compliance on the matters of national environmental significance and rectify the non-compliance; and f) the time by when the approval holder will rectify the non-compliance. 	Not applicable	No potential non-compliances have occurred during the reporting period.

2Condition	Description	Compliant/non-compliant or not applicable	Comments
33	Upon the direction of the Minister, the approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister. The audit must not commence unless and until the Minister has approved the independent auditor and audit criteria. The audit report must address the criteria to the satisfaction of the Minister.	Not applicable	Arrow has not received any such direction from the Minister.
34	If the approval holder wishes to carry out any activity other than in accordance with the management plans as specified in the conditions, the approval holder must submit to the Department for the Minister's written approval a revised version of that management plan. The approval holder must not commence the varied activity until the Minister has approved the varied management plan. The Minister will not approve a varied management plan unless the revised management plan would result in an equivalent or improved environmental outcome over time. If the Minister approves the revised management plan, that management plan must be implemented in place of the management plan originally approved.	Not applicable	Arrow does not plan to carry out any activity other than in accordance with the management plans as specified in the Conditions.
35	If the Minister believes that it is necessary or convenient for the better protection of EPBC Act listed threatened species, listed migratory species or water resources to do so, the Minister may request that the approval holder make specified revisions to the management plans specified in the conditions and submit the revised management plan for the Minister's written approval. The approval holder must comply with any such request within the timeframe specified by the Minister. The revised approved management plan must be implemented. Unless the Minister has approved the revised management plan, then the person taking the action must continue to implement the management plan originally approved, as specified in the conditions.	Not applicable	Arrow has not received any such requests from the Minister.
36	If, at any time after five years from the date of this approval, the approval holder has not commenced the action, then the approval holder must not commence the action without the written agreement of the Minister.	Compliant	The Approved Action commenced on 14 February 2019 which is within 5 years of the original approval date of 27 October 2014.
37	Unless otherwise agreed to in writing by the Minister, the approval holder must publish all management plans referred to in these conditions of approval on their website. Each management plan must be published on the website within 1 month of being approved by the Minister and remain available on that website for the life of the approval.	Compliant	All approved management plans have been published on Arrow's website. Management plans approved by DCCEEW and published within 1 month on the Arrow website include those listed in Section 3.2.