

Pluto – North West Shelf Interconnector Compliance Assessment Plan

Ministerial Statement 1117



Revision: 1
Date: 1 May 2020

Document Revision History

Rev	Date	Author	Reviewer	Approver	Revision Description
0.1	10/03/2020	M Brown			Initial Draft
0	29/04/2020	M Brown	L Watson	R Maple	Initial Submission
1	1/5/2020	M Brown	L Watson	R Maple	Revised on DWER feedback

Table of Contents

1.	INTRODUCTION	1
2.	TIMING	1
3.	APPROACH AND TIMING	1
4.	COMPLIANCE AUDIT TABLE	3
5.	RETENTION OF COMPLIANCE ASSESSMENTS	13
6.	REPORTING OF NON-COMPLIANCES AND CORRECTIVE ACTIONS	13
7.	PUBLIC AVAILABILITY.....	13
8.	COMPLIANCE ASSESSMENT REPORT TABLE OF CONTENTS – PROPOSED	14
9.	REVISION OF COMPLIANCE ASSESSMENT PLAN.....	14

List of Tables

Table 1: Approach and Timing of assessments	1
Table 2: Compliance Audit Table	3
Table 3: Compliance Assessment Report – Table of Contents	14

1. INTRODUCTION

On 21 November 2019, the Minister for Environment issued Ministerial Statement 1117 (MS1117) for the construction of the Pluto North West Shelf Interconnector Pipeline (PNI). The PNI includes the construction and operation of 3.3km of natural gas pipeline on the Burrup Peninsula in the Pilbara region.

The project will commence at the Pluto Compressor Station within the Dampier to Bunbury Natural Gas Pipeline (DBNGP) corridor and connect the Pluto gas plant with the Karratha gas plant (KGP).

DDG Operations Pty Ltd (DDG) is the proponent and Nominated Operator for the project.

Under Condition 4-1 of MS1117, a Compliance Assessment Plan (this Plan) is required to be submitted prior to implementation of the proposal or at least six months prior to the first Compliance Assessment Report submission. Condition 4-2 of MS117 sets out the requirements for the Plan and these are captured below.

This Compliance Assessment Plan has been prepared by DDG in accordance with the Western Australian Environmental Protection Authority's (EPA) *Post Assessment Guidelines for Preparing a Compliance Assessment Plan* (OEPA, 2012) and includes the following information:

- timing and frequency of compliance reporting;
- approach and timing of compliance assessments;
- audit table
- retention of compliance assessments;
- method of reporting potential non-compliances and corrective actions taken;
- public availability of compliance reports; and
- table of contents of compliance reports.

2. TIMING

Compliance Assessments shall be undertaken annually to review compliance to the conditions of MS1117.

Obligations held within implementation plans (as required under MS1117) shall be addressed for compliance throughout the construction and operation of the project. This shall include weekly site inspections, Health, Safety and Environment (HSE) Field Audits and a HSE System Audit. Project monitoring, as set out in the Construction Environmental Management Plan (CEMP) and the Cultural Heritage Management Plan (CHMP) shall be ongoing and used to provide evidence or data towards compliance assessment. This shall include environmental data during construction such as fauna interaction information.

The assessment protocol, as set out in Section 3, includes the timing and frequency of monitoring against the measurement criteria.

3. APPROACH AND TIMING

Compliance to MS1117 shall be assessed as outlined in the Approach and Timing Table (Table 1).

Table 1: Approach and Timing of assessments

Audit Code MS1117:	Assessment	Timing
1-1	Assessment of all clearing undertaken during and post construction against approval conditions (Table 2 Schedule 1)	During and post Construction
2-1	Correspondence with Department of Water and Environmental Regulation (DWER)	Within 28 days
3-1	Commencement of the project	Within 5 years
3-2	Substantial completion of the project	Within 5 years
4-1	Correspondence with DWER Compliance Assessment Plan	Prior to implementation or 6 months prior to first Compliance Assessment Report being due (August 2020)
4-2	Approval of Compliance Assessment Plan Correspondence with DWER	Post submission to DWER
4-3	Compliance Assessment Reports	Within 15 months of the approval of the project (21 February) then annually
4-4	Compliance Assessment Reports	Annually
4-5	Correspondence with DWER Internal Event reporting	Within 7 days of known non-compliance
4-6	Compliance Assessment Reports	Within 15 months of the approval of the project (21 February) then annually
5-1	AGIG PNI Website page hosts required public documentation Compliance Assessment Reports	Annually
5-2	Correspondence with DWER	As required
6-1	Cultural Heritage Management Plan	Prior to and during construction phase

6-2	Cultural Heritage Management Plan Compliance Assessment Reports	Annually
6-3	Cultural Heritage Management Plan Correspondence with DWER	Approval of / confirmation of implementation
6-4	Cultural Heritage Management Plan Correspondence with DWER (revision approval)	Revised as required
7-1	Construction Environmental Management Plan	Prior to and during construction phase
7-2	Construction Environmental Management Plan Compliance Assessment Reports	Annually
7-3	Construction Environmental Management Plan Correspondence with DWER	Approval of / confirmation of implementation
7-4	Construction Environmental Management Plan Correspondence with DWER (revision approval)	Revised as required

4. COMPLIANCE AUDIT TABLE

The Compliance Assessment Plan Audit Table template (Table 2) sets out the when, what and how compliance is assessed. This includes evidence proposed against the conditions of the Ministerial Statement. This table will act as the template for the Compliance Assessment Report Audit Table. This table is based on *Post Assessment Guideline – Preparing a Compliance Assessment Report* (OEPA 2012).

Table 2: Compliance Audit Table

Condition No. MS1117	Subject	Phase	Condition	How	Evidence	When	Compliance Status	Notes / Further Information
1-1	Implementation	Overall	<p>When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Table 2 of Schedule 1, unless amendments to the proposal and the authorised extent of the proposal have been approved under the Environmental Protection Act (EP Act).</p> <p>Table 2, Schedule 1: Vegetation Clearing shall not exceed:</p> <p>No more than 10.69ha of which 3.26ha is within the KGP Lease and Buffer Zone lease and 7.43ha within the DBNGP Corridor and Dampier Facilities Area.</p>	Implement the proposal as per MS1117 Table 2 Schedule 1	<p>Vegetation Drawdown Register</p> <p>Project Environmental Inspections</p> <p>Final construction GIS / survey date</p> <p>Compliance Assessment Reports</p>	During and post construction		

Condition No. MS1117	Subject	Phase	Condition	How	Evidence	When	Compliance Status	Notes / Further Information
2-1	Contact Details	Overall	The proponent shall notify the Chief Executive Officer (CEO) of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.	Notify the CEO of any change of name or address	Copy of correspondence with DWER	Within 28 days of such change		
3-1	Time Limit for Proposal Implementation	Overall	The proponent shall not commence implementation of the proposal after five (5) years from the date of this Statement, and any commencement, prior to this date, must be substantial.	Implement the proposal prior to 21 November 2024	Compliance Assessment Reports	By 21 November 2024		
3-2	Time Limit for Proposal Implementation	Implementation	Any commencement of implementation of the proposal, on or before five (5) years from the date of this Statement, must be demonstrated as substantial by providing the CEO with written evidence, on or before the expiration of five (5) years from the date of this Statement.	Substantially commence the proposal.	Correspondence with DWER including Annual Compliance Assessment Reports of proposal progress	By 21 November 2024		

Condition No. MS1117	Subject	Phase	Condition	How	Evidence	When	Compliance Status	Notes / Further Information
4-1	Compliance Reporting	Overall	The proponent shall prepare, and maintain a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 4-6, or prior to implementation of the proposal, whichever is sooner.	Approved Compliance Assessment Plan (this plan)	Correspondence with DWER (submission and approval of Compliance Assessment Plan)	Prior to implementation or 6 months prior to first Compliance Assessment Report being due (21 August 2020)		
4-2	Compliance Reporting	Overall	The Compliance Assessment Plan shall include: (1) the frequency of compliance reporting; (2) the approach and timing of compliance assessments; (3) the retention of compliance assessments; (4) the method of reporting of potential non-compliances and corrective actions taken; (5) the table of contents of Compliance Assessment Reports; and (6) public availability of Compliance Assessment Reports.	Approved Compliance Assessment Plan (this plan)	Correspondence with DWER (submission and approval of Compliance Assessment Plan)	Post submission to DWER		

Condition No. MS1117	Subject	Phase	Condition	How	Evidence	When	Compliance Status	Notes / Further Information
4-3	Compliance Reporting	Overall	After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of condition 4-2, the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 4-1.	Compliance is assessed according to Compliance Assessment Plan	Correspondence with DWER (submission and approval of Compliance Assessment Plan) Compliance Assessment Report	Within 15 months of the approval of the project (21 February) then annually		
4-4	Compliance Reporting	Overall	The proponent shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by condition 4-1 and shall make those reports available when requested by the CEO.	Reports, records and data shall be retained in accordance with document management system	Records available and used as evidence in Compliance Assessment Report	Annually		
4-5	Compliance Reporting	Overall	The proponent shall advise the CEO of any potential non-compliance within seven (7) days of that non-compliance being known.	All non-compliance events are reported within timeframes to the CEO	Correspondence with DWER (includes phone communication and written records)	Within 7 days of known non-compliance		

Condition No. MS1117	Subject	Phase	Condition	How	Evidence	When	Compliance Status	Notes / Further Information
4-6	Compliance Reporting	Overall	<p>The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO.</p> <p>The Compliance Assessment Report shall:</p> <ul style="list-style-type: none"> (1) be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf; (2) include a statement as to whether the proponent has complied with the conditions; (3) identify all potential non-compliances and describe corrective and preventative actions taken; (4) be made publicly available in accordance with the approved Compliance Assessment Plan; and (5) indicate any proposed changes to the Compliance 	Submission of Compliance Assessment Report on time	Correspondence with DWER (includes submission and receipt of Annual Compliance Reports)	Within 15 months of the approval of the project (21 February) then annually		

Condition No. MS1117	Subject	Phase	Condition	How	Evidence	When	Compliance Status	Notes / Further Information
			Assessment Plan required by condition 4-1.					

Condition No. MS1117	Subject	Phase	Condition	How	Evidence	When	Compliance Status	Notes / Further Information
5-1	Public Availability of Data	Overall	Subject to condition 5-2, within a reasonable time period approved by the CEO of the issue of this Statement and for the remainder of the life of the proposal the proponent shall make publicly available, in a manner approved by the CEO, all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps)), management plans and reports relevant to the assessment of this proposal and implementation of this Statement.	All publically available data is updated and available both on request and through the AGIG Website.	AGIG website hosts relevant documentation and data. Reviewed when undertaking the Annual Compliance Report	Life of the proposal		
5-2	Public Availability of Data	Overall	If any data referred to in condition 5-1 contains particulars of: (1) a secret formula or process; or (2) confidential commercially sensitive information; The proponent may submit a request for approval from the CEO to not make these data publically available. In making such a request the proponent shall provide the CEO with an explanation and reasons why the data should	Submission of requests to the CEO	Correspondence with DWER (in relation to requests)	As required		

Condition No. MS1117	Subject	Phase	Condition	How	Evidence	When	Compliance Status	Notes / Further Information
			not be made publically available.					
6-1	Cultural Heritage Management Plan Implementation	Overall	The proponent shall implement the proposal to meet the following environmental objective: (1) Avoid where possible and minimise direct and indirect impact so that the proposal does not cause long term impacts on Aboriginal Heritage values.	Implement Cultural Heritage Management Plan (CHMP)	Compliance Assessment Report details implementation of the CHMP	Prior to and during construction phase		
6-2	Cultural Heritage Management Plan Implementation	Overall	In order to meet the requirements of condition 6-1, the proponent shall implement the Pluto - NWS Interconnector Cultural Heritage Management Plan (version 1, December 2018).	Implementation of the CHMP	Compliance Assessment Report details implementation of the CHMP	Until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 6-1		
6-3	Cultural Heritage Management Plan Implementation	Overall	The proponent shall implement the most recent version of the Cultural Heritage Management Plan which the CEO has confirmed by notice in writing, addresses the requirements of condition 6-1.	Approval of any revisions of the CHMP ensuring Condition 6-1 is met	Correspondence with DWER (approval of any new revisions) Compliance Assessment Reports against CHMP	Until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 6-1		

Condition No. MS1117	Subject	Phase	Condition	How	Evidence	When	Compliance Status	Notes / Further Information
6-4	Cultural Heritage Management Plan Implementation	Overall	The proponent shall continue to implement the Cultural Heritage Management Plan (version 1, December 2018), or any subsequent revisions as approved by the CEO in condition 6-3, until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 6-1.	CEO confirms that the objective in Condition 6-1 has been met by the plan or revisions	Correspondence with DWER (approval of any new revisions) Compliance Assessment Reports against CHMP	Until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 6-1.		
7-1	Construction Environmental Management Plan Implementation	Overall	Construction Environmental Management Plan Implementation The proponent shall implement the proposal to meet the following environmental objective: (1) Avoid, where possible, and minimise direct and indirect impacts as far as practicable to Priority flora; Terminalia supranitifolia (P3) and Rhynchosia bungarensis (P4). (2) Avoid, where possible, and minimise direct and indirect impacts as far as practicable to significant fauna; Dasyurus hallucatus (Northern Quoll) and Liasis olivaceus barroni (Pilbara Olive Python).	Construction Environmental Management Plan (CEMP)	Compliance Assessment Report details implementation of the CEMP	Until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 7-1.		

Condition No. MS1117	Subject	Phase	Condition	How	Evidence	When	Compliance Status	Notes / Further Information
7-2	Construction Environmental Management Plan Implementation	Overall	In order to meet the requirements of condition 7-1, the proponent shall implement the Pluto North West Shelf Interconnector Construction Environmental Management Plan (Rev B, April 2019).	Implementation of the CEMP	Compliance Assessment Report details implementation of the CEMP	Until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 7-1.		
7-3	Construction Environmental Management Plan Implementation	Overall	The proponent shall implement the most recent version of the Construction Environmental Management Plan which the CEO has confirmed by notice in writing, addresses the requirements of condition 7-1.	Approval of any revisions of the CEMP ensuring Condition 7-1 is met	Correspondence with DWER (approval of any new revisions) Compliance Assessment Reports against CEMP	Until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 7-1.		
7-4	Construction Environmental Management Plan Implementation	Overall	The proponent shall continue to implement the Construction Environmental Management Plan (Rev B, April 2019), or any subsequent revisions as approved by the CEO in condition 7-3, until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 7-1.	CEO confirms that the objective in Condition 7-1 has been met by the plan or revisions	Correspondence with DWER (approval of any new revisions) Compliance Assessment Reports against CEMP	Until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 7-1.		

5. RETENTION OF COMPLIANCE ASSESSMENTS

As required under Condition 4-4 of MS11174 and the DWER Guideline all compliance assessment documentation including associated evidence, monitoring data and documentation shall be kept for the duration of the project plus seven years.

6. REPORTING OF NON-COMPLIANCES AND CORRECTIVE ACTIONS

Condition 4-5 requires that all non-compliances be reported to DWER within seven days of the event occurring. Where the non-compliance includes potential for significant or materials harm, AGIG shall also meet requirements for pollution notification.

DDG also has notification requirements under the *Petroleum Pipelines (Environmental) Regulations 2012* for reporting of incidents. All of these requirements are set out in the approved CEMP under Condition 7-2

All non-compliance reports shall detail the following:

- Date of non-compliance (event);
- Details of event including extent and impacts;
- Current status of event;
- Location (precise details) of event;
- Cause of the event and remedial / corrective actions taken; and
- What control measures were in place prior to the event and any changes to those controls to prevent re-occurrence.

Non-compliances shall be notified to the CEO of DWER through immediate (or as soon as information is available) verbal communication (phone) with a follow up email notification within seven days providing further details as listed above. Contact information is set out in the CEMP.

7. PUBLIC AVAILABILITY

Condition 5-1 requires that where not sensitive, information relating to the project be made publically available. This includes monitoring results, environmental data and the associated reports shall be made the Compliance Assessment Reports available to the public.

Where documentation is required to be made publically available, this shall be available on the AGIG website.

www.agig.com.au

8. COMPLIANCE ASSESSMENT REPORT TABLE OF CONTENTS – PROPOSED

The proposed table of contents of the Compliance Assessment Report is set out in Table 3.

Table 3: Compliance Assessment Report – Table of Contents

Heading	Description
Introduction	Brief details of project including: Ministerial Statement 1117 reference.
Scope	Includes the reporting period for the Report.
Current Status	Summary of the current implementation status. Includes construction progress to date, commissioning status, status of pipeline and future dates in relation to operation. Includes achievements during the reporting period and any revisions to approved documentation (plans) and their status of approval during the period.
Compliance	Discussion on achievement against compliance conditions including addressing any non-compliances.
Table of Compliance (Audit Table)	Ministerial Statement Condition Audit Table (as per the Compliance Assessment Plan Audit table). This includes a compliance status and progress towards completion of works and evidence used to demonstrate compliance.
Environmental Information / monitoring	Details of any environmental monitoring or data collected during the reporting period.
Statement of Compliance	Endorsement by the CEO (as per DWER Form).
Appendices	Relevant appendices to support evidence in Table of Compliance.

9. REVISION OF COMPLIANCE ASSESSMENT PLAN

The Compliance Assessment Plan shall be revised to reflect any changes to actions or requirements within the previously approved Compliance Assessment Plan.