

Compliance Report

North Galilee Basin Rail Project

EPBC 2013/6885

13 October 2017 to 12 October 2018

1. **DECLARATION OF ACCURACY**

In making this declaration, I declare that to the best of my knowledge the information I have given on or attached to this compliance report is complete, current and correct. I understand that giving false or misleading information is a serious offence.

Signed 

Full name (please print) *HAMISH MANDA*

Position (please print) *HEAD OF ENVIRONMENT & SUSTAINABILITY*

Organisation (please print including ABN/ACN if applicable) *ADANI MINING PTY LTD*

Date *11 / 01 / 2019*

2. **DOCUMENT VERSION CONTROL**

Rev	Issue Date	Description of revisions	Signatures			
			Originator	Checked	Approved	Date
A	9/1/2019	Draft – Revision A Preparation of compliance report	V. Vong	C. Morris H. Manzi	H. Manzi	9/1/2019
0	10/1/2019	Final For publication	V.Vong	H. Manzi	H. Manzi	10/1/2019

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4. DESCRIPTION OF ACTIVITIES

EPBC number	2013/6885
Project name	North Galilee Basin Rail Project, Abbot Point to Galilee Basin
Approval holder and ACN or ABN	Adani Mining Pty Ltd ACN 145 455 205
The approved action	The construction and operation of a rail corridor approximately 310km in length, including standard gauge rail and associated infrastructure, from approximately 70 km east of the Carmichael Mine, to the Port of Abbot Point, Queensland [See EPBC Act referral 2013/6885 and request to vary proposal dated 16 April 2014]
Details of activities undertaken during report period	Early works activities undertaken included the establishment of temporary fencing, clearing and grubbing, filling and excavation and surveys including environmental and cultural heritage.
Location of the project	Approximately 70 km north west of Clermont, central Queensland The rail alignment branches off approximately 70 km east of the Carmichael Mine on the proposed Carmichael Project’s east-west rail corridor (the subject of separate investigations – refer EPBC 2010/5736), in the vicinity of Mistake Creek, northwards to connect with supporting infrastructure at the Port of Abbot Point.
Person accepting responsibility for the report	Hamish Manzi – Head of Environment & Sustainability Internal audit completed by Vanessa Vong – Manager, Environment
Dates for the reporting period of the report	13 October 2017 to 12 October 2018
Date of preparation of the report	This compliance report prepared in January 2019

5. COMPLIANCE TABLE

An internal audit was completed in October 2018 and the compliance table below presents the audit findings. The criteria used in the internal audit are below. The criteria has been sourced as per the New South Wales Government Independent Audit Guideline:

- **Compliant:** Where the auditor has collected sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit.
- **Non-compliant:** Where the auditor has collected sufficient verifiable evidence to demonstrate that the intent of one or more specific elements of the regulatory approval have not been complied with within the scope of the audit.
- **Not verified:** Where the auditor has not been able to collect sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. In the absence of sufficient verification the auditor may in some instances be able to verify by other means (visual inspection, personal communication etc) that a requirement has been met. In such a situation, the requirement should still be assessed as not verified. However the auditor could note in the report that they have no reasons to believe that the operation is non-compliant with that requirement.
- **Not triggered:** A regulatory approval requirement has an activation or timing trigger that has not been met at the time of the audit, therefore a determination of compliance could not be made
- **Note:** A statement or fact, where no assessment of compliance is required.

Condition no.	Condition	Is the project compliant?	Evidence/Comments
1	<i>Conditions attached to the approval</i> The Minister may determine that a plan, report or strategy approved by the Queensland Government satisfies a plan, report or strategy required under these conditions.	Note	This condition is a statement where no assessment of compliance is required.
2	<i>Project area</i> For the purpose of the action, the approval holder must not clear vegetation outside the Project Area shown in Figures 1-2 and 2-2 of Volume 2 Appendix B of the Final EIS unless targeted surveys have demonstrated that Matters of National Environmental Significance will not be impacted.	Compliant	Verification during the internal audit of the clearing footprints overlayed on geographical information systems confirms that all clearing was undertaken within the approved rail corridor/Project Area.
3	<i>Disturbance limits</i>	Compliant	Pre-clearance surveys were conducted prior to the commencement of activities. During the internal audit, the clearing footprint was overlayed on geographical

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	<p>The approval holder must comply with the disturbance limits for specified EPBC Act listed threatened species and ecological communities as specified in Table 1.</p> <p>Note: 1. The maximum disturbance limits in Table 1 apply to authorised impacts on EPBC Act listed species and communities as a result of construction, operation and decommissioning of the rail corridor and associated infrastructure within the Project area (i.e. they are 'whole of Project' disturbance limits) for the duration of the Project approval.</p> <p>Table 1: Maximum disturbance limits for EPBC Act listed species and commur</p> <table border="1" data-bbox="360 596 913 1347"> <thead> <tr> <th data-bbox="360 596 622 660">Species</th> <th data-bbox="622 596 913 660">Maximum disturbance (i.e. maximum residual impact to habitat)</th> </tr> </thead> <tbody> <tr> <td colspan="2" data-bbox="360 660 913 692">Listed threatened species – fauna</td> </tr> <tr> <td data-bbox="360 692 622 740">Australian Painted Snipe</td> <td data-bbox="622 692 913 740">45.6 hectares</td> </tr> <tr> <td data-bbox="360 740 622 788">Black-throated Finch</td> <td data-bbox="622 740 913 788">1836.2 hectares</td> </tr> <tr> <td data-bbox="360 788 622 836">Squatter Pigeon</td> <td data-bbox="622 788 913 836">1361.8 hectares</td> </tr> <tr> <td data-bbox="360 836 622 884">Ornamental Snake</td> <td data-bbox="622 836 913 884">421.6 hectares</td> </tr> <tr> <td data-bbox="360 884 622 932">Koala</td> <td data-bbox="622 884 913 932">2047.6 hectares</td> </tr> <tr> <td colspan="2" data-bbox="360 932 913 963">Listed threatened species – flora</td> </tr> <tr> <td data-bbox="360 963 622 1011">Black Ironbox</td> <td data-bbox="622 963 913 1011">175.4 hectares</td> </tr> <tr> <td data-bbox="360 1011 622 1059">King Bluegrass</td> <td data-bbox="622 1011 913 1059">263.3 hectares</td> </tr> <tr> <td data-bbox="360 1059 622 1107">Bluegrass</td> <td data-bbox="622 1059 913 1107">354.2 hectares</td> </tr> <tr> <td data-bbox="360 1107 622 1155">Threatened ecological community</td> <td data-bbox="622 1107 913 1155">Maximum disturbance (i.e. maximum residual impact to community)</td> </tr> <tr> <td data-bbox="360 1155 622 1203">Brigalow (<i>Acacia harpophylla</i> dominant and co-dominant)</td> <td data-bbox="622 1155 913 1203">195.2 hectares</td> </tr> <tr> <td data-bbox="360 1203 622 1267">Natural grasslands of the Queensland central highlands and the northern Fitzroy Basin</td> <td data-bbox="622 1203 913 1267">133.2 hectares</td> </tr> <tr> <td data-bbox="360 1267 622 1347">Semi-evergreen vine thickets of the Brigalow Belt (north and south) and Nandewar regions</td> <td data-bbox="622 1267 913 1347">55.7 hectares</td> </tr> </tbody> </table> <p data-bbox="360 1347 936 1393"><i>Note: Table 1 is derived from information in the Coordinator-General's Assessment Report (August 2014).</i></p>	Species	Maximum disturbance (i.e. maximum residual impact to habitat)	Listed threatened species – fauna		Australian Painted Snipe	45.6 hectares	Black-throated Finch	1836.2 hectares	Squatter Pigeon	1361.8 hectares	Ornamental Snake	421.6 hectares	Koala	2047.6 hectares	Listed threatened species – flora		Black Ironbox	175.4 hectares	King Bluegrass	263.3 hectares	Bluegrass	354.2 hectares	Threatened ecological community	Maximum disturbance (i.e. maximum residual impact to community)	Brigalow (<i>Acacia harpophylla</i> dominant and co-dominant)	195.2 hectares	Natural grasslands of the Queensland central highlands and the northern Fitzroy Basin	133.2 hectares	Semi-evergreen vine thickets of the Brigalow Belt (north and south) and Nandewar regions	55.7 hectares		<p>information systems to confirm that the impact habitat area of each species was within the quantity of maximum disturbance limits. The total area of impact to date was confirmed to be within the disturbance limits in Table 1.</p>
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4	<p><i>Matters of National Environmental Significance Management Plan/s (MNESMP)</i></p> <p>At least three months prior to commencement, the approval holder must submit to the Minister for approval Matters of National Environmental Significance management plan/s for the management of direct and indirect impacts of the proposed action on MNES, being for the purposes of the MNESMP: the species and communities listed in Table 1, and the Outstanding Universal Value of the Great Barrier Reef World Heritage Area.</p> <p>Note: If the MNESMP does not address specific future activities it should be updated in accordance with Condition 20 and submitted to the Department prior to these specific future activities being undertaken.</p>	Compliant	The Species Management Plan (SMP) for the project was submitted to the Federal Department for assessment and approval on 4 November 2015. It was approved on 20 July 2016.
5	<p><i>Matters of National Environmental Significance Management Plan/s (MNESMP)</i></p> <p>The MNESMP must be consistent with relevant recovery plans, threat abatement plans and approved conservation advices and must include:</p> <ul style="list-style-type: none"> a) a description of environmental values for each of the MNES addressed in the MNESMP b) details of baseline and impact monitoring measures to be implemented for each of the MNES including control and impact sites to be monitored throughout the life of the project. The monitoring must provide sufficient data to quantify likely impacts resulting from the proposed action, to determine appropriate habitat management goals (See condition 5e and 5f) c) details potential impacts, including area of impact, on each of the MNES from the proposed action, including impacts from: <ul style="list-style-type: none"> i. vegetation clearing ii. earthworks iii. construction works iv. noise and vibration v. train strike vi. emissions (including dust) vii. light spill and other visual impacts viii. waterway crossings ix. weeds and pests d) measures that will be undertaken to mitigate and manage impacts on MNES resulting from the proposed action. These measure must include but not be limited to: 	Compliant	The Species Management Plan (SMP) for the project was developed to meet the requirements of this condition and submitted to the Federal Department for assessment and approval on 4 November 2015. It was approved on 20 July 2016.

Condition no.	Condition	Is the project compliant?	Evidence/Comments
	<ul style="list-style-type: none"> i. for MNES to which the MNESMP apply (See conditions 4, 7 and 9), relevant mitigation measures proposed in section 7.6, 7.8 and 7.9 of Volume 2 Appendix D of the Final EIS ii. the use of fauna spotters prior to and during all vegetation clearing activities to ensure impacts on MNES are minimised iii. measures to avoid impacts on MNES and their habitat located in the Project Area, but outside areas to be cleared or constructed upon, including adjacent to cleared areas iv. measures to rehabilitate all disturbed areas of habitat for MNES addressed in the MNESMP (See conditions 4, 7 and 9). e) goals for habitat management for each relevant MNES f) a table of specific criteria for assessing the success of management measures against goals , and triggers for implementing corrective measures if criteria are not met within specified timeframes. Goals and triggers must be based on the baseline condition of the relevant MNES as determined through baseline monitoring (see condition 5b). Corrective measures must include provision of offsets where it is determined that corrective measures have not achieved goals within specified timeframes g) an ongoing monitoring program to determine the success of mitigation and management measures against the criteria required in condition 5f, including monitoring locations, parameters and timing. h) details of how non-compliance will be reported. i) details of how the MNESMP will be updated to incorporate and address outcomes from surveys undertaken for MNES under this and any state approvals, including updating of goals, criteria and triggers (as required under conditions 5e and 5f) j) provisions to ensure that suitably qualified and experienced persons are responsible for undertaking monitoring, review and implementation of the MNESMP. 		
6	<p><i>Matters of National Environmental Significance Management Plan/s (MNESMP)</i></p> <p>The approval holder must not commence until all the required MNESMP have been approved by the Minister in writing. The approved plan/s must be implemented.</p>	Compliant	<p>The Species Management Plan (SMP) for the project was submitted to the Federal Department for assessment and approval on 4 November 2015. It was approved on 20 July 2016.</p> <p>The MNESMP has been implemented as part of the works that have commenced.</p>
7	<p><i>Matters of National Environmental Significance Management Plan/s (MNESMP)</i></p>	Not triggered	<p>Pre-clearance surveys were conducted for the alignment applicable to the scope of this compliance</p>

Condition no.	Condition	Is the project compliant?	Evidence/Comments
	<p>Where pre-clearance surveys, as required under state approvals, identify individuals of, or habitat for, an EPBC Act listed species or community not previously identified and reported to the Department, the approval holder must notify the Department in writing within five business days of finding these individuals or habitat, and within 40 business days of finding these individuals or habitat must submit to the Department for the Minister's written approval updated MNESMP detailing how impacts to the newly identified EPBC Act listed species or community will be avoided, mitigated and/or offset. Once approved, the revised MNESMP must be implemented.</p>		<p>report. Within this surveyed area, no new individuals or habitat not previously identified within the scope of this approval were identified during the surveys completed to date.</p> <p>As a result, no notification to the Federal Department has been triggered.</p>
8	<p><i>Matters of National Environmental Significance Management Plan/s (MNESMP)</i></p> <p>The approval holder must revise the MNESMP following pre-clearance surveys required under state approvals, and resubmit the MNESMP to the Department for the Minister's written approval within 3 months of pre-clearance surveys being completed. Once approved, the revised MNESMP must be implemented.</p>	Not triggered	<p>Pre-clearance surveys were conducted for the alignment applicable to the scope of this compliance report. Within this surveyed area, no new individuals or habitat not previously identified within the scope of this approval were identified during the surveys completed to date.</p> <p>As a result, the MNESMP has not been revised following completion of the pre-clearance surveys.</p>
9	<p><i>Matters of National Environmental Significance Management Plan/s (MNESMP)</i></p> <p>If, through pre-clearance surveys as required under state approvals, individuals of, or habitat for, an EPBC Act listed species or community not previously identified and reported to the Department are identified, the approval holder must not start or, in the case of work already commenced, must immediately cease any part of the proposed action that may significantly impact that EPBC Act listed species or community, until MNESMP addressing these impacts have been approved by the Minister in writing. Once approved, the revised MNESMP must be implemented.</p> <p>Note: Management plans may also be required under associated EPBC approvals (EPBC 2010/5736 and EPBC 2011/6194) and under state approvals. Whenever possible a combined document should be prepared to address both state government and EPBC Act approval conditions.</p>	Not triggered	<p>Pre-clearance surveys were conducted for the alignment applicable to the scope of this compliance report. Within this surveyed area, no new individuals or habitat not previously identified within the scope of this approval were identified during the surveys completed to date.</p> <p>As a result, the MNESMP has not been revised following completion of the pre-clearance surveys.</p>
10	<p><i>Biodiversity offset strategy (BOS)</i></p> <p>To compensate for authorised unavoidable impacts on Matters of National Environmental Significance, the approval holder must submit a BOS to the Minister at least two months prior to commencement.</p>	Compliant	<p>A Biodiversity Offset Strategy (BOS) was submitted to the Federal Department for assessment and approval on 13 January 2017. The BOS was approved on 22 August 2017.</p>

Condition no.	Condition	Is the project compliant?	Evidence/Comments
11	<p><i>Biodiversity offset strategy (BOS)</i> Offsets for authorised unavoidable impacts (defined as maximum disturbance limits in Table 1, or actual impacts as defined after detailed design and pre-clearance surveys required under state approvals), must be managed in accordance with the BOS.</p>	Compliant	<p>The BOS was submitted to the Federal Department for assessment and approval on 13 January 2017. The BOS was approved on 22 August 2017.</p> <p>The project has continued to work towards implementation of the BOS through the submission of Offset Area Management Plans (OAMPs). OAMPs have been submitted to the Federal Department for assessment and approval on 20 February 2018.</p>
12	<p><i>Biodiversity offset strategy (BOS)</i> The BOS must be consistent with the Galilee Basin Strategic Offset Strategy, relevant recovery plans, threat abatement plans, conservation advices and MNESMP (see Condition 5), and must include:</p> <ul style="list-style-type: none"> a) location of species and communities habitat offset areas including maps in electronic Geographic Information System (GIS) format b) details of how offset sites have been or will be legally secured within 2 years of commencement to ensure their long-term protection c) details of how offset sites adequately compensate for residual significant impacts to matters of national environmental significance in accordance with the EPBC Act Offsets Policy d) a monitoring program for the offset site/s suitable to measure the success of the management measures against stated performance criteria including monitoring locations, parameters and timing e) a description of the potential risks to the successful implementation of the BOS, and details of measures that will be implemented to mitigate these risks f) details of how the BOS will be updated to incorporate outcomes from surveys undertaken for Matters of National Environmental Significance under this and any state approvals, including updating of goals, criteria and triggers (as outlined at Conditions 5e) and 5f)) g) an outline of how compliance with the BOS will be reported h) provisions to ensure suitably qualified and experienced persons are responsible for undertaking monitoring, review and implementation of the BOS i) detailed processes for any residual impacts on MNES (see Condition 5f) to be offset in accordance with the EPBC Act Offsets Policy including a process for offset requirements to be developed in consultation with the Department and relevant Queensland Government agencies 	Compliant	<p>The BOS was developed submitted to meet the requirements of this condition and was submitted to the Federal Department for assessment and approval on 13 January 2017. The BOS was approved on 22 August 2017.</p>

Condition no.	Condition	Is the project compliant?	Evidence/Comments
	j) a detailed process for any significant residual impact on any EPBC listed threatened species or community not identified in Table 1 to be offset in accordance with the EPBC Act Offsets Policy (See Condition 7).		
13	<p><i>Biodiversity offset strategy (BOS)</i> The approval holder must not commence unless and until the BOS has been approved by the Minister in writing. The approved BOS must be implemented.</p> <p>Note: A Biodiversity Offset Strategy is also required under the State Government approval for the project. A single document may be prepared to address both State Government and EPBC Act approval conditions.</p>	Compliant	<p>The BOS was submitted to the Federal Department for assessment and approval on 13 January 2017. The BOS was approved on 22 August 2017.</p> <p>The Queensland Government approved the BOS on 19 September 2017.</p>
14	<p><i>Offset area management plans (OAMP)</i> Within six months of identifying any offset area in accordance with Conditions 5 or 12, the approval holder must submit to the Minister for approval a management plan for that offset area. Each offset area management plan must address the relevant requirements of the BOS, and contain:</p> <p>a) detailed baseline description of offset areas, including surveys undertaken, condition of existing Matters of National Environmental Significance and their habitats, relevant environmental values, area of primary habitat for each EPBC Act listed threatened species and community, connectivity with other habitat areas and biodiversity corridors</p> <p>b) management measures and offset plans for each offset area to improve the habitats of Matters of National Environmental Significance</p> <p>c) a table of specific goals and associated timeframes for habitat management measures for each offset area with criteria for assessing the success of habitat management measures and corrective measures to be implemented if criteria are not met</p>	Compliant	<p>The BOS was submitted to the Federal Department for assessment and approval on 13 January 2017. The BOS was approved on 22 August 2017.</p> <p>The project has continued to work towards implementation of the BOS through the submission of OAMPs. OAMPs have been submitted to the Federal Department for assessment and approval on 20 February 2018.</p>
15	<p><i>Offset area management plans (OAMP)</i> Once approved, offset area management plans must be implemented.</p>	Not triggered	The OAMPs have not yet been approved by the Federal Department.
16	<p><i>Standard conditions</i> Within 30 days of the commencement of the action, the person taking the action must advise the Department in writing of the actual date of commencement</p>	Compliant	Notification of the commencement of the action to the Federal Department was made on 5 October 2017 with an intended commencement date of 9 October 2017. Subsequent notification was undertaken confirming commencement occurred on 13 October 2017. This is the date of commencement for the purposes of this compliance report.
17	<i>Standard conditions</i>	Compliant	Numerous mechanisms are in place and include:

Condition no.	Condition	Is the project compliant?	Evidence/Comments
	<p>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 and strategies required by this approval, and make them available upon request to the Department. 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.</p>		<ul style="list-style-type: none"> • Use of a stakeholder, compliance and environmental monitoring system • Use of a document management system • Implementation and continual improvement of an ISO14001 certified Environmental Management System. • Monthly status meetings held with the Federal Department to share project updates and progress against conditions.
18	<p><i>Standard conditions</i> Within three months of every 12 month anniversary of the commencement of the action, the approval holder must publish a report on its website addressing compliance with each of the conditions of this approval, including implementation of any management plans as specified in the conditions. The report must remain on the website for three years. Documentary evidence providing proof of the date of publication must be provided to the Department at the same time as the compliance report is published. Likely (as defined by relevant triggers incorporated in the MNESMP as required by Condition 5f) or actual non-compliance with any of the conditions of this approval must be reported to the Department in writing within 2 business days of the approval holder becoming aware of the likely or actual non-compliance.</p>	Not triggered	<p>This compliance report will be published on the website within the relevant timeframe. However, this falls outside the scope of the current reporting period of this compliance report.</p>
19	<p><i>Standard conditions</i> 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 independent auditor and audit criteria must be approved by the Minister prior to the commencement of the audit. The audit report must address the criteria to the satisfaction of the Minister.</p>	Not triggered	<p>The Minister has not requested that an independent audit of compliance with the conditions of the approval is conducted.</p>
20	<p><i>Standard conditions</i> The approval holder may choose to revise a management plan, report or strategy approved by the Minister under condition 4 without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the revised management plan, report or strategy would not be likely to have a new or increased impact. If the approval holder makes this choice they must:</p> <p>a) notify the Department in writing that the approved management plan, report or strategy has been revised and provide the Department with an electronic copy of the revised management plan, report or strategy;</p>	Note	<p>No revisions of management plans, reports or strategies has occurred within the scope of this compliance report.</p>

Condition no.	Condition	Is the project compliant?	Evidence/Comments
	<p>b) implement the revised management plan, report or strategy from the date that the management plan, report or strategy is submitted to the Department; and</p> <p>c) for the life of this approval, maintain a record of the reasons the approval holder considers that taking the action in accordance with the revised management plan, report or strategy would not be likely to have a new or increased impact.</p>		
20A	<p><i>Standard conditions</i> The approval holder may revoke their choice under condition 20 at any time by notice to the Department. If the approval holder revokes the choice to implement a revised management plan, report or strategy, without approval under section 143A of the EPBC Act, the management plan, report or strategy approved by the Minister must be implemented.</p>	Note	This has not yet occurred.
20B	<p><i>Standard conditions</i> Condition 20 does not apply if the revisions to the approved management plan, report or strategy include changes to environmental offsets provided under the management plan, report or strategy in relation to the matter, unless otherwise agreed in writing by the Minister. This does not otherwise limit the circumstances in which the taking of the action in accordance with a revised management plan, report or strategy would, or would not, be likely to have new or increased impacts.</p>	Note	This has not yet occurred.
20C	<p><i>Standard conditions</i> If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the revised management plan, report or strategy would be likely to have a new or increased impact, then:</p> <p>a) condition 20 does not apply, or ceases to apply, in relation to the revised management plan, report or strategy; and</p> <p>b) the approval holder must implement the management plan, report or strategy approved by the Minister.</p> <p>To avoid any doubt, this condition does not affect any operation of conditions 20, 20A and 20B in the period before the day the notice is given.</p> <p>At the time of giving the notice the Minister may also notify that for a specified period of time that condition 20 does not apply for one or more specified plans or strategies required under the approval.</p>	Note	This has not yet occurred.

Condition no.	Condition	Is the project compliant?	Evidence/Comments
20D	<p><i>Standard conditions</i></p> <p>Conditions 20, 20A, 20B and 20C are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised management plan, report or strategy to the Minister for approval.</p>	Note	This has not yet occurred.
21	<p><i>Standard conditions</i></p> <p>If the Minister believes that it is necessary or convenient for the better protection of the World Heritage properties, National Heritage places, listed threatened species and communities, listed migratory species, the Great Barrier Reef Marine Park or Commonwealth marine areas to do so, the Minister may request that the approval holder make specified revisions to the management plans, reports and strategies specified in the conditions and submit the revised management plans, reports, and strategies for the Minister's written approval. The approval holder must comply with any such request. The revised approved management plans, reports and strategies, must be implemented. Unless the Minister has approved the revised management plans, reports and strategies, then the approval holder must continue to implement the management plans, reports and strategies originally approved, as specified in the conditions.</p>	Note	This has not yet occurred.
22	<p><i>Standard conditions</i></p> <p>If, at any time after ten years from the date of this approval, approval holder has not substantially commenced the action, then the approval holder must not substantially commence the action without the written agreement of the Minister.</p>	Compliant	Notification of the commencement of the action to the Federal Department was made on 5 October 2017 with an intended commencement date of 9 October 2017. Subsequent notification was undertaken confirming commencement occurred on 13 October 2017. This is the date of commencement for the purposes of this compliance report.
23	<p><i>Standard conditions</i></p> <p>Unless otherwise agreed to in writing by the Minister, the approval holder must publish all management plans, reports, and strategies referred to in these conditions of approval on its website. Each management plan, report, and strategy must be published on the website within one month of being approved and remain on the website for not less than ten years, or a longer period if specified in writing by the Minister, and be otherwise made available to any party upon written request for the duration of the approval. The approval holder must provide the requested management plan/s, report/s, and/or strategy/ies to the requesting party within 10 business days of receiving the request.</p>	Compliant	<p>The following plans were observed to be published on Adani's website:</p> <ul style="list-style-type: none"> • SMP for the project dated May 2016 • BOS dated July 2017

6. **NEW ENVIRONMENTAL RISKS**

No new environmental risks have been identified during the reporting period.