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**Argyle Cattle Company Pty Ltd**

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# Argyle Cattle Company

Shamrock Station Irrigation Project EPBC  
2017/8004 – 2023 Compliance Audit  
Report

# Argyle Cattle Company

## Shamrock Station Irrigation Project EPBC 2017/8004 – 2023 Compliance Audit Report

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Ramboll  
Level 7  
41 St Georges Terrace  
Perth  
Western Australia 6000  
Australia

T +61 8 9225 5199  
<https://ramboll.com>

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Confidential

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## Abbreviations

<b>Acronym</b>	<b>Definition</b>
ACC	Argyle Cattle Company Pty Ltd
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DWER	Department of Water and Environmental Regulation
DWROS	Detailed Water Resource Operating Strategy
EP Act	Environmental Protection Act 1986
EPBC Act	Environmental Protection and Biodiversity Conservation Act 1999
MNES	Matter of National Environmental Significance
MS1086	Ministerial Statement 1086
OEMP	Operational Environmental Management Plan
Ramboll	Ramboll Australia Pty Ltd

## 1. Executive Summary

Argyle Cattle Company Pty Ltd (ACC) operates the Shamrock Station Irrigation Project (The Project), located within Shamrock Station on the Great Northern Highway in the locality of La Grange, within the Shire of Broome. The Project is located 64km south of Broome and approximately 130km by road. The Project comprises a 12-pivot irrigation project for the production of irrigated pasture. To date, five of the 12 pivot areas have been cleared and, of these, two are under irrigation for hay cropping. The pivots are not currently under intensive grazing.

The Shamrock Station Irrigation Project is regulated by the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) under the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) through EPBC 2017/8004, and by the State Department of Water and Environmental Regulation (DWER) under the State *Environmental Protection Act 1986* (EP Act) via Ministerial Statement 1086 (MS1086). This Compliance Audit Report pertains to reporting required under EPBC 2017/8004.

Approval to implement the project with respect to the EPBC Act was granted under EPBC 2017/8004 on 10 September 2020. Condition 14 of EPBC 2017/8004 requires ACC to ensure that independent audits of compliance are undertaken annually. Condition 15 requires that the independent auditor and the audit criteria are to be approved by the DCCEEW prior to the audit being undertaken. DCCEEW approved Ramboll Australia Pty Ltd (Ramboll) as the independent auditor and the audit criteria on 22 September 2022. ACC’s compliance reporting period is from 01 January to 31 December in each calendar year. Compliance Audit Reports are required to be submitted to DCCEEW within 60 business days following the end of the compliance reporting period.

Ramboll conducted the independent audit through a desktop review of relevant documentation supplied by ACC, a site visit to the Shamrock Station Irrigation Project site, conducted on 19 – 20 December 2023, and interviews with ACC’s Shamrock Station General Manager, Shamrock Station Assistant Manager and ACC Executive Services Manager. The scope of the audit included conditions set by the Commonwealth Minister for Environment under EPBC 2017/2008 and commitments made by ACC with respect to the Project’s Operational Environmental Management Plan (OEMP) and Detailed Water Resource Operating Strategy (DWROS).

The independent audit identified two non-compliances pertaining to commitments presented in the OEMP, as summarised in the following table.

Reference	Condition / commitment	Non-compliance
OEMP FV2	Flora and Vegetation: Clearing Demarcate and establish 100-200 metre square fenced vegetation buffers around each pivot.	The fencing required under Provision FV2 has not been installed around the five pivots constructed to date. It was noted that the pivots are not currently used for intensive grazing and therefore there has been no disturbance from intensive grazing on the pivots or adjacent land. It was also noted that the entire paddock on which the pivots are located is fenced.

Reference	Condition / commitment	Non-compliance
OEMP FV3	Flora and Vegetation: Weeds Undertake monitoring of crop and weed species outside of irrigation areas to detect spread into adjacent native vegetation. If monitoring identifies outbreaks of crop species, undertake weed control with a DBCA/DPIRD approved herbicide.	There is no evidence of the 2023 annual post wet season weed monitoring having been carried out. Informal visual inspections are carried out during operations. During the site inspection, it was noted that Rhodes Grass had not spread beyond the boundary of the irrigated area on the two irrigated pivots, Pivot 1 and 2.

Although two non-compliances were identified, they were not considered by the independent auditor to have resulted in an impact to a Matter of National Environmental Significance (MNES).

## 2. Details of the audit

The details of the audit are presented in Table 1.

**Table 1 Proponent Details**

Aspect	Description
Name of Project	Shamrock Station Irrigation Project
Name of the project approval holder	Argyle Cattle Company Pty Ltd
Details of the approval to which the audit relates	Shamrock Station Irrigation Project, West Kimberley Region (EPBC 2017/8004)
Scope of the audit	<p>The reporting period comprises 01 January to 31 December (as agreed by the then DAWE via correspondence (Ref: 2017/8004) dated 20/09/2021).</p> <p>The approval conditions audited comprised:</p> <ul style="list-style-type: none"> <li>• EPBC 2017/8004 Conditions 1 to 23;</li> <li>• Operational Environmental Management Plan (OEMP) (dated 28/04/2022) Management Provisions FV1 to FV3, TF1 to TF4 and HP1 to HP4; and</li> <li>• Detailed Water Resource Operating Strategy proponent commitments 1 to 6.</li> </ul>
Dates when and locations of audit	A site inspection of the Shamrock Station Irrigation Project was performed on 19/12/2023.
Methods used to assess compliance	<p>The audit was undertaken by John Nielsen, Lead Consultant from Ramboll Australia Pty Ltd (Ramboll). John is an accredited Principal Environmental Management Systems Auditor with Exemplar Global (Certification Number 14608).</p> <p>The audit comprised a desktop review of documentation supplied by ACC and a site visit to the Shamrock Station Irrigation Project operations and head office. The site visit was undertaken on 19-20/12/2023. The following ACC representatives participated in the audit either through interviews or the supply of documentary evidence.</p> <ul style="list-style-type: none"> <li>• Ben Mills, Shamrock Station General Manager, Argyle Cattle Company;</li> <li>• Caitlin Mills, Shamrock Station Assistant Manager, Argyle Cattle Company; and</li> <li>• Yolande Ledgerwood, Executive Services Manager, Argyle Cattle Company.</li> </ul>
Evidence reviewed to assess compliance	The evidence reviewed to assess compliance is presented in the detailed audit findings tables (Appendices A, B and C), with a consolidated list presented in Appendix D.

### 3. Certification by the Auditor

John Nielsen, Lead Consultant, Ramboll Australia Pty Ltd

E: [jnielsen@ramboll.com](mailto:jnielsen@ramboll.com)

M: +61 408 945 321

Qualifications and Experience:

- BSc – Applied Science – Biology. Curtin University (WA).
- BSc (Hons) – Marine Biology. Murdoch University (WA).
- Accredited Principal Environmental Management Systems Auditor with Exemplar Global (Certification Number 14608).
- Over 30 years' experience as an environmental professional, comprising 10 years as a researcher in the government sector and over 20 years as an environmental consultant servicing the mining, petroleum, infrastructure, agribusiness, and government sectors.

Auditor's declaration:

I, John Nielsen:

- For environmental audits that are required by a condition of an Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) approval I certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct and complete.

I am aware that section 491 of the EPBC Act makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both.



Signature:

Date: 18 March 2024



## 4. Detailed Audit Findings

### 4.1 Assessment of Compliance

The audit findings are classified in accordance with the definitions provided in Table 2. These definitions are drawn from DoEE (2019).

**Table 2 Compliance Status Definitions**

Compliance Status	Acronym	Definition
Compliance	Y	A rating of 'compliance' is given when the auditee has complied with a condition or element of a condition.
Non-compliance	N	A rating of 'non-compliance' is given when the auditee has not met a condition or an element of a condition.
Not applicable at time of audit	NA	A rating of 'not applicable' at the time of the audit is given when the condition or element of a condition falls outside the scope of the audit e.g. if an activity has not yet commenced or a requirement has not been triggered.
Observation	O	An 'observation' may be made about issues relevant to the protection of a matter of national environmental significance when the issue is not strictly related to compliance or non-compliance with a condition or element of a condition.

### 4.2 Summary of findings

A total of 67 elements were audited comprising fifty (50) EPBC 2017/8004 conditions (Appendix A), eleven (11) Proponent OEMP commitments (Appendix B) and six (6) Proponent DWROS commitments (Appendix C). The audit findings are summarised in Table 3.

**Table 3 Summary of audit findings in relation to EPBC MS1086 conditions, OEMP provisions and DWROS proponent commitments**

Compliance Status	EPBC 2017/8004 Conditions (Appendix A)	Proponent Operational EMP Provisions (Appendix B)	Detailed Water Resource Operating Strategy proponent commitments (Appendix C)
Compliant (Y)	22	9	5
Non-Compliant (N)	0	2	0
Not Applicable at time of audit (NA)	28	0	1
Observation (O)	0	0	0
<b>Total</b>	<b>50</b>	<b>11</b>	<b>11</b>

The detailed audit findings are presented as follows:

- Appendix A: EPBC 2017/8004 Conditions 1 to 23;
- Appendix B: Operational Environmental Management Plan (OEMP) (dated 28/04/2022) Management Provisions FV1 to FV3, TF1 to TF4 and HP1 to HP4; and
- Appendix C: Detailed Water Resource Operating Strategy proponent commitments 1 to 6.

### **4.3 Discussion of Non-compliances**

#### **4.3.1 Operational Environmental Management Plan Provision FV2**

##### **OEMP Provision FV2: Demarcate and establish 100-200 metre square fenced vegetation buffers around each pivot.**

Fences were not installed around each of the pivots constructed to date. It was noted during the audit that the boundary of the paddock used for the Project was fenced.

It is understood that the purpose of the fencing was to retain cattle on the pivots (avoiding impacts to native vegetation off-pivots) in the event that intensive grazing is carried out. As intensive grazing is not planned to occur in the foreseeable future, there appears to be no practical requirement to install the fencing at the present time. As there has been no intensive grazing carried out to date, the lack of fencing around each pivot has not resulted in an impact to an MNES.

During interviews with ACC management personnel, the failure to install fencing around each pivot was considered to be an oversight, given that intensive grazing has not occurred to date and is not planned to occur for the foreseeable future. A lack of clarity in the OEMP regarding the required timing for installing the fencing at the boundary of each pivot was also cited as a potential reason for the oversight.

As a result of this finding of non-compliance, ACC proposes to clarify with State DWER, the requirement for the installation of fencing at the boundary of each pivot, given that intensive grazing has not occurred to date and is not planned to occur for the foreseeable future. Argyle may amend the wording of Provision FV2 in the OEMP to the effect that fencing would only be installed around each pivot in the event that intensive grazing was proposed to occur. This amendment would avoid unnecessarily installing the fencing (and the associated clearing of native vegetation required to install the fencing) when no intensive grazing is occurring, whilst leaving the possibility of intensive grazing (subject to fencing) as a future operational option.

#### **4.3.2 Operational Environmental Management Plan Provision FV3**

##### **OEMP Provision FV3: Undertake monitoring of crop and weed species outside of irrigation areas to detect spread into adjacent native vegetation.**

Weed monitoring has not yet commenced as set out under Provision FV3 of the OEMP. During interviews with ACC management personnel, the failure to conduct weed monitoring was considered to be a result of staff turnover (loss of support staff whose responsibilities included administering the OEMP) and low familiarity with the requirement to undertake weed monitoring as per the OEMP.

In May 2023, ACC appointed a new Executive Services Manager whose responsibilities include administration of EPBC 2017/8004. As a result of this finding of non-compliance, ACC proposes to establish a risk-based weed monitoring program. The program would identify key sites for undertaking weed monitoring with the objective of detecting incursions of crop species into the surrounding native vegetation. The program would identify the number of sites to be monitored, the data and photographic evidence to be collected and the form of reporting to be undertaken as verification that the monitoring has been carried out. ACC also proposes to create an Environmental Obligations Register to assist with managing compliance with EPBC 2017/8004, and the associated OEMP and DWROS.

During the independent audit, it was noted that the crop (Rhodes Grass (*Chloris Gayana*)) was growing to within the limits of the irrigated area of the two pivots currently under irrigation (Pivots 1 and 2). The spread of Rhodes Grass beyond the boundaries of the irrigated areas on Pivots 1 and 2 was not observed at the time of the audit. Consequently, the lack of weed monitoring to date is not considered to have resulted in a significant impact to MNES.

Appendix A  
EPBC 2017/8004 – Detailed Audit Findings

**Appendix A: EPBC 2017/8004- Detailed Audit Findings**

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
<b>Part A- Conditions specific to the action</b>						
<b>EPBC Approval Condition 1</b>		For the protection of EPBC Act listed threatened species and communities including the Greater Bilby ( <i>Macrotis lagotis</i> ) the approval holder must not: <ul style="list-style-type: none"> <li>• Clear more than 650 hectares of vegetation, or</li> <li>• Disturb, through grazing, more than 550 hectares (not including the area cleared) within the project area</li> </ul>				
1.1	For the protection of EPBC Act listed threatened species and communities including the Greater Bilby ( <i>Macrotis lagotis</i> ) the approval holder must not: <ul style="list-style-type: none"> <li>• Clear more than 650 hectares of vegetation</li> </ul>	Review of aerial imagery and/or clearing records to ensure no more than 650 hectares of vegetation have been cleared. Site inspection.	Aerial imagery dated to October 2023 shows that no more 200 hectares of vegetation have been cleared.  5 out of 12 pivots have been cleared to date, as observed during the site visit (19/12/2023).	[1] Shamrock development Envelope KML file.	Aerial imagery shows that no more than 650 hectares of vegetation have been cleared. As of 31/12/2023, only 5 of the 12 approved 40-hectare pivots have been cleared within the development envelope.	Compliant (Y)
1.2	For the protection of EPBC Act listed threatened species and communities including the Greater Bilby ( <i>Macrotis lagotis</i> ) the approval holder must not: <ul style="list-style-type: none"> <li>• Disturb, through grazing, more than 550 hectares (not including the area cleared) within the project area</li> </ul>	Review of aerial imagery / disturbed land within the project area to ensure no more than 550 hectares has been disturbed. Site inspection.	Aerial imagery dated to October 2023 shows that no more 200 hectares of vegetation have been cleared.  Site inspection (19/12/2023). Discussion with Shamrock Station General Manager (19/12/2023).	N/A	Aerial imagery shows that no more than 650 hectares of vegetation have been cleared. As of 31/12/2023, only 5 of the 12 approved 40-hectare pivots have been cleared within the development envelope.  The perimeter of the permit area is fenced and cattle are not grazed with the permit area (as advised by the Shamrock Station General Manager). No cattle were observed to be grazing within the permit area at the time of the audit and there was no evidence that cattle have been grazed on the pivots to date.	Compliant (Y)
<b>EPBC Approval Condition 2</b>		For the protection of EPBC Act listed threatened species and communities including the Greater Bilby ( <i>Macrotis lagotis</i> ) the approval holder must commence implementing the Operational Environmental Management Plan prior to the commencement of the action and continue to implement the Operational Environmental Management Plan, or a revised version approved by the Minister in accordance with condition 3 or condition 17-22, for the rest of the life of this approval.				

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
2.1	For the protection of EPBC Act listed threatened species and communities including the Greater Bilby ( <i>Macrotis lagotis</i> ) the approval holder must commence implementing the Operational Environmental Management Plan prior to the commencement of the action and continue to implement the Operational Environmental Management Plan, or a revised version approved by the Minister in accordance with condition 3 or condition 17-22, for the rest of the life of this approval.	Records of the implementation of management provisions contained within the Operational Environmental Management Plan (Refer to Appendix B).	<p>The Shamrock Development Envelope KML file shows that project clearing has not occurred outside of the development envelope. Clearing has occurred more than 100m from the edge of the development envelope.</p> <p>Pre-clearing surveys were conducted across all planned pivot areas by a qualified zoologist. Pre-clearing survey reports conducted did not find evidence of Bilbies within the five pivot areas cleared to date (S1PB01, S1PB02, S1PB03, S1PB05, S1PB06).</p>	<p>[1] Shamrock Development Envelope KML file</p> <p>[2] Pre-clearing Bilby survey reports</p>	<p>During the reporting period:</p> <ul style="list-style-type: none"> <li>Pre-clearance surveys indicate that the OEMP was implemented; and</li> <li>The results of the pre-clearance surveys support the view that impacts on the Greater Bilby were avoided.</li> </ul>	Compliant (Y)
<b>EPBC Approval Condition 3</b>		<p>To compensate for residual significant impacts to the Greater Bilby (<i>Macrotis lagotis</i>), within 12 months of the implementation of the <b>Operational Environmental Management Plan</b>, the approval holder must undertake an annual review of this document, and within 40 <b>business days</b> of the completion of this review, the approval holder must submit for the <b>Minister's</b> approval a revised <b>Operational Environmental Management Plan</b>, which addresses the following commitments:</p> <ol style="list-style-type: none"> <li>if after a minimum of four consecutive years, feral cats (<i>Felis catus</i>) and foxes (<i>Vulpes vulpes</i>) have been demonstrated to be absent from the <b>control area</b>, surveillance monitoring, capable of detecting if any individual of these species has returned to the <b>control area</b>, must be conducted at least once every two years; and</li> <li>if subsequently, surveillance monitoring (as required under condition 3a) detects feral cats (<i>Felis catus</i>) and/or foxes (<i>Vulpes vulpes</i>) within the <b>control area</b>, annual control and monitoring measures, undertaken in accordance with the <b>program methods</b>, must be resumed for at least 20 years or until both feral species have again been demonstrated to be absent for a minimum of four consecutive years.</li> <li>The approved revised Operational Environmental Management Plan must be implemented.</li> </ol>				

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
3.1	If after a minimum of four consecutive years, feral cats ( <i>Felis catus</i> ) and foxes ( <i>Vulpes vulpes</i> ) have been demonstrated to be absent from the control area, surveillance monitoring, capable of detecting if any individual of these species has returned to the control area, must be conducted at least once every two years.	Review of introduced animal control reports and introduced animal monitoring reports. Records of the review and amendment of the Operational Environmental Management Plan incorporating commitments pertaining to Condition 3a and 3b.	The OEMP was revised in April 2022 to incorporate the commitments required under EPBC 2017/2008 Condition 3. Feral fauna control records show that feral fauna are not absent from the control area.	[3] ACC (2002) Operational Environmental Management Plan revised 28/04/2022. [4] Shamrock Introduced animal monitoring 2021 v0 baseline [5] Feral Fauna Control Records 2022 [6] Shamrock Introduced animal monitoring 2022 v0 [7] Shamrock Station Irrigation Project Introduced Animal Monitoring October 2023 (Boyle, A. 2023)	The OEMP was revised in April 2022 to incorporate the commitments required under EPBC 2017/2008 Condition 3. Feral fauna control records show that feral fauna are not absent from the control area. Surveillance monitoring and feral fauna control were undertaken in 2021, 2022 and 2023 and are ongoing.	Compliant (Y)
3.2	If subsequently, surveillance monitoring (as required under condition 3a) detects feral cats ( <i>Felis catus</i> ) and/or foxes ( <i>Vulpes vulpes</i> ) within the control area, annual control and monitoring measures, undertaken in accordance with the program methods, must be resumed for at least 20 years or until both feral species have again been demonstrated to be absent for a minimum	Review of introduced animal control reports and introduced animal monitoring reports.	Surveillance monitoring during 2023 detected the presence of feral cats in the control area however no foxes were detected.	[7] Shamrock Station Irrigation Project Introduced Animal Monitoring October 2023 (Boyle, A. 2023)	Surveillance monitoring and feral fauna control were undertaken in 2023 and are ongoing.	Compliant (Y)

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	of four consecutive years.					
3.3	The approved revised Operational Environmental Management Plan must be implemented.	Review of records of the implementation of management provisions contained in the Operational Environmental Management Plan (Appendix B).	The revised Operational Environmental Plan has been implemented (Appendix B).	[3] ACC (2022) Operational Environmental Management Plan revised 28/04/2022. [7] Shamrock Station Irrigation Project Introduced Animal Monitoring October 2023 (Boyle, A. 2023)	Implementation of the Operational Environmental Management Plan throughout the reporting period has occurred. Records of the implementation of the management provisions of the Operational Environmental Management plan is provided in Appendix B.	Compliant (Y)
<b>EPBC Approval Condition 4</b>		For the protection of EPBC Act listed threatened species and communities, listed migratory species, wetlands of international importance and the listed heritage values of a National Heritage Place, the approval holder must commence implementing the Detailed Water Resource Operating Strategy prior to the commencement of the action and continue to implement the Detailed Water Resource Operating Strategy for the life of this approval.				
4.1	For the protection of EPBC Act listed threatened species and communities, listed migratory species, wetlands of international importance and the listed heritage values of a National Heritage Place, the approval holder must commence implementing the Detailed Water Resource Operating Strategy prior to the commencement of the action and continue to implement the Detailed Water Resource Operating	Review of records of the implementation of commitments in the Detailed Water Resource Operating Strategy (Refer to Appendix C ).	Implementation of the Detailed Water Resource Operating Strategy is provided in Appendix C.	[8] Detailed Water Resource Operating Strategy (dated 17/07/2019)	Implementation of the Detailed Water Resource Operating Strategy throughout the reporting period has occurred. Records of the implementation of the management provisions of the Detailed Water Resource Operating Strategy plan is provided in Appendix C.	Compliant (Y)



EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	Strategy for the life of this approval.					
<b>Part B- Standard administrative conditions</b>						
<b>EPBC Approval Condition 5</b>		The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.				
5.1	The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	Record of notification to the Department of the action within 10 business days after the date of commencement of the action.	Email from Argyle Cattle Company on the 22 <sup>nd</sup> of June 2021 stating that clearing for the project had commenced on the 15 <sup>th</sup> of June 2021.	[9] Commencement date for Shamrock Irrigation Project email chain	The department was notified; within 10 business days after the date of commencement of the action.	Compliant (Y)
<b>EPBC Approval Condition 6</b>		If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister.				
6.1	If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister.	Records of the commencement of the Shamrock Station Irrigation Project occurring within 5 years from the 10 <sup>th</sup> of September 2020.	Email from Argyle Cattle Company on the 28 <sup>th</sup> of April 2023 stating that clearing for the project had commenced on the 15 <sup>th</sup> of June 2021.	[9] Commencement date for Shamrock Irrigation Project email chain	Not Applicable at time of audit	N/A Not Applicable at time of audit
<b>EPBC Approval Condition 7</b>		The approval holder must maintain accurate and complete compliance records.				
7.1	The approval holder must maintain accurate and complete compliance records.	Review of complete compliance records and methods for maintaining documents and records.	The EPBC 2017/8004 Shamrock Station Irrigation Project annual compliance reports for the 2021 and 2022 periods were completed and are available on the Argyle Cattle Website.	[10] EPBC 2017/8004 Shamrock Station Irrigation Project Annual Compliance Report 2021 [11] EPBC 2017/8004 Shamrock Station Irrigation Project	The EPBC 2017/8004 Shamrock Station Irrigation Project annual compliance reports for the 2021 and 2022 periods were completed and are available on the Argyle Cattle Website.	Compliant (Y)

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
				Annual Compliance Report 2022		
<b>EPBC Approval Condition 8</b>		If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.				
8.1	If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.	Compliance records provided to the Department.	Discussion with Shamrock Station General Manager and Executive Services Manager (19/12/2023).	N/A	No requests from the Department were made during the reporting period.	N/A Not Applicable at time of audit
<b>EPBC Approval Condition 9</b>		The approval holder must: <ul style="list-style-type: none"> <li>a. submit plans electronically to the Department;</li> <li>b. publish each plan on the website within 20 business days of the date of this approval, decision, or the date the plan is approved by the Minister, unless otherwise agreed to in writing by the Minister;</li> <li>c. exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public; and</li> <li>d. keep plans published on the website until the end date of this approval.</li> </ul>				
9.1	The approval holder must: <ul style="list-style-type: none"> <li>a. submit plans electronically to the Department</li> </ul>	Records of plans submitted to the Department.	A review of the 2022 EPBC annual compliance report indicates that the Operational Environmental Management Plan and the Detailed Water Resource Operating Strategy were sent to the Department.	[11] EPBC 2017/8004 Shamrock Station Irrigation Project Annual Compliance Report 2022	The Operational Environmental Management Plan and the Detailed Water Resource Operating Strategy were sent to the Department as attachments to the 2022 EPBC annual compliance report.	Compliant (Y)
9.2	<ul style="list-style-type: none"> <li>b. publish each plan on the website within 20 business days of the date of this approval decision, or the date the plan is approved by the Minister, unless</li> </ul>	Records of plans published on website.	A review of the Argyle Cattle Company Website shows that the Operational Environmental Management Plan and Detailed Water Resource Operating Strategy have been published on the website ( <a href="#">Shamrock Station   Argyle Cattle Company</a> )	[24] Argyle Cattle Website ( <a href="#">Shamrock Station   Argyle Cattle Company</a> )	The Operational Environmental Management Plan and Detailed Water Resource Operating Strategy are published on the Argyle Cattle Website.	Compliant (Y)

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	otherwise agreed to in writing by the Minister					
9.3	c. exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public	Review of ecological data in plans published on the website.	A review of the Operational Environmental Management Plan against the Australian Government Department of the Environment (2016) Sensitive Ecological Data Access and Management Policy indicates that the ecological data contained within the OEMP does not meet the criteria of sensitive ecological data.	[24] Argyle Cattle Website ( <a href="#">Shamrock Station   Argyle Cattle Company</a> )	Ecological data contained within the OEMP does not meet the DoE (2016) criteria of sensitive ecological data.	Compliant (Y)
9.4	d. keep plans published on the website until the end date of this approval.	Records of plans published on website.	A review of the Argyle Cattle Company Website shows that the Operational Environmental Management Plan and Detailed Water Resource Operating Strategy have been published on the website ( <a href="#">Shamrock Station   Argyle Cattle Company</a> )	[24] Argyle Cattle Website ( <a href="#">Shamrock Station   Argyle Cattle Company</a> )	The Operational Environmental Management Plan and Detailed Water Resource Operating Strategy are published on the Argyle Cattle Website.	Compliant (Y)
<b>EPBC Approval Condition 10</b>		The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under a plan, is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to the Department within one month of that monitoring data being collected.				
10.1	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under a plan, is prepared in accordance with the	Review of ecological survey and monitoring data submitted to the Department and dates of data collection and submission.	No clearing for the development of pivots was carried out during the reporting period and therefore no pre-clearance bilby surveys were required or conducted. No other biodiversity surveys or monitoring pertaining to Matters of National Environmental Significance	[3] ACC (2002) Operational Environmental Management Plan revised 28/04/2022. [8] Detailed Water Resource Operating Strategy (dated 17/07/2019)	No pre-clearance bilby surveys were required or conducted during the reporting period. Similarly, no other biodiversity surveys or monitoring pertaining to Matters of National Environmental Significance were required or carried out during the reporting period.	N/A Not Applicable at time of audit

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to the Department within one month of that monitoring data being collected.		were carried out during the reporting period.			
<b>EPBC Approval Condition 11</b>		<p>The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:</p> <ol style="list-style-type: none"> <li>publish each compliance report on the website within 60 business days following the relevant 12 month period;</li> <li>notify the Department by email that a compliance report has been published on the website and provide the weblink for the compliance report within five business days of the date of publication;</li> <li>keep all compliance reports publicly available on the website until this approval expires;</li> <li>exclude or redact sensitive ecological data from compliance reports published on the website; and</li> <li>where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication</li> </ol>				
11.1	<p>The approval holder must:</p> <ol style="list-style-type: none"> <li>publish each compliance report on the website within 60 business days following the relevant 12 month period</li> </ol>	Records of compliance reports prepared and published on the website	The EPBC 2017/8004 Shamrock Station Irrigation Project compliance reports for the 2021 and 2022 reporting periods, have been published on the Website ( <a href="#">Shamrock Station   Argyle Cattle Company</a> ).	<p>[10] EPBC 2017/8004 Shamrock Station Irrigation Project Annual Compliance Report 2021</p> <p>[11] EPBC 2017/8004 Shamrock Station Irrigation Project Annual Compliance Report 2022</p> <p>[24] Shamrock station- Argyle Cattle Company website (<a href="#">Shamrock Station   Argyle Cattle Company</a>)</p>	The EPBC compliance reports for the 2021 and 2022 reporting periods are available on the Shamrock Station website.	Compliant (Y)
11.2	<ol style="list-style-type: none"> <li>notify the Department by email that a</li> </ol>	Records of notification to the Department that compliance reports have	Records of emails to the department with the attached compliance	[10] EPBC 2017/8004 Shamrock Station Irrigation Project	The EPBC compliance reports for the 2021 and 2022 reporting periods included	Compliant (Y)

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	compliance report has been published on the website and provide the weblink for the compliance report within five business days of the date of publication	been published on the website	reports were viewed. The 2021 compliance report email was dated to have been sent on the 28 <sup>th</sup> of April 2022, and the 2022 compliance report was dated to have been sent on the 28 <sup>th</sup> of February 2023.	Annual Compliance Report 2021 [11] EPBC 2017/8004 Shamrock Station Irrigation Project Annual Compliance Report 2022 [24] Shamrock station- Argyle Cattle Company website ( <a href="#">Shamrock Station   Argyle Cattle Company</a> )	notification and a link to the reports on the Shamrock Station website.	
11.3	c. keep all compliance reports publicly available on the website until this approval expires	Records of compliance reports publicly available on the website	The EPBC 2017/8004 Shamrock Station Irrigation Project compliance reports for the 2021 and 2022 reporting periods, have been published on the Website ( <a href="#">Shamrock Station   Argyle Cattle Company</a> ).	[10] EPBC 2017/8004 Shamrock Station Irrigation Project Annual Compliance Report 2021 [11] EPBC 2017/8004 Shamrock Station Irrigation Project Annual Compliance Report 2022 [24] Shamrock station- Argyle Cattle Company website ( <a href="#">Shamrock Station   Argyle Cattle Company</a> )	Records of the compliance reports for the 2021 and 2022 reporting periods are publicly available on the website.	Compliant (Y)
11.4	d. exclude or redact sensitive ecological data from compliance reports published on the website	Review of ecological data in CARs published on the website.	A review of the 2021 and 2022 compliance reports against the Australian Government Department of the Environment (2016) Sensitive Ecological Data Access and Management Policy indicates that the compliance reports do not contain sensitive ecological data.	[10] EPBC 2017/8004 Shamrock Station Irrigation Project Annual Compliance Report 2021 [11] EPBC 2017/8004 Shamrock Station Irrigation Project Annual Compliance Report 2022	Ecological data contained within the compliance reports does not meet the DoE (2016) criteria of sensitive ecological data.	Compliant (Y)

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
11.5	e. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication	Where sensitive ecological data has been excluded, record of submission of full compliance report to the Department within 5 business days of publication.	Ecological data contained within the compliance reports do not meet the DoE (2016) criteria of sensitive ecological data.	[10] EPBC 2017/8004 Shamrock Station Irrigation Project Annual Compliance Report 2021 [11] EPBC 2017/8004 Shamrock Station Irrigation Project Annual Compliance Report 2022	Sensitive ecological data has not been included in the compliance reports.	N/A Not Applicable at time of audit
<b>EPBC Approval Condition 12</b>		<p>The approval holder must notify the Department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify:</p> <p>a. any condition which is or may be in breach;</p> <p>b. a short description of the incident and/or non-compliance; and</p> <p>c. the location (including co-ordinates), date, and time of the incident and/or non-compliance.</p> <p>In the event the exact information cannot be provided, provide the best information available.</p>				
12.1	The approval holder must notify the Department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance.	Review of incident records. Review of notifications to the Department in writing of any incidents, non-compliance with the conditions; or non-compliance with the commitments made in plans.	<p>A discussion with the Shamrock Station General Manager and a site inspection of the Shamrock Station Irrigation Project indicated that no incidents that would be likely to result in a significant impact on a Matter of National Environmental Significance have occurred during the reporting period.</p> <p>Non-compliances that are of a minor nature that have not resulted in material environmental impacts have been</p>	N/A	No incidents that would be likely to result in a significant impact on a Matter of National Environmental Significance were recorded during the reporting period.	N/A Not Applicable at time of audit

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
			recorded and reported in this Compliance Audit Report.			
12.2	The notification must specify: a. any condition which is or may be in breach	Records of notification to the Department of any condition which is or may be in breach.	Refer to 12.1	N/A	Refer to 12.1	N/A Not Applicable at time of audit
12.3	b. short description of the incident and/or non-compliance;	Records of notification to the Department must include a short description of the incident or non-compliance.	Refer to 12.1	N/A	Refer to 12.1	N/A Not Applicable at time of audit
12.4	c. the location (including co-ordinates), date, and time of the incident and/or non-compliance.  In the event the exact information cannot be provided, provide the best information available.	Records of notification to the Department specifying the location (including co-ordinates), date, and time of the incident and/or non-compliance.	Refer to 12.1	N/A	Refer to 12.1	N/A Not Applicable at time of audit
<b>EPBC Approval Condition 13</b>		The approval holder must provide to the Department the details of any incident or noncompliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying: a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future; b. the potential impacts of the incident or non-compliance; and c. the method and timing of any remedial action that will be undertaken by the approval holder.				
13.1	The approval holder must provide to the Department the details of any incident or noncompliance with the conditions or commitments made in plans as soon as	Review of incident records. Records of notifications to the Department of any incident or non-compliance and dates of notifications.	A discussion with the Shamrock Station General Manager and a site inspection of the Shamrock Station Irrigation Project indicated that no incidents that would be likely to result in a significant	N/A	No incidents that would be likely to result in a significant impact on a Matter of National Environmental Significance were recorded during the reporting period.	N/A Not Applicable at time of audit

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	practicable and no later than 10 business days after becoming aware of the incident or non-compliance specifying:		<p>impact on a Matter of National Environmental Significance have occurred during the reporting period.</p> <p>Non-compliances that are of a minor nature that have not resulted in material environmental impacts have been recorded and reported in this Compliance Audit Report.</p>			
13.2	a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;	Records of notifications to the Department specifying any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;	Refer to 13.1	N/A	Refer to 12.1	N/A Not Applicable at time of audit
13.3	b. the potential impacts of the incident or non-compliance;	Records of notifications to the Department specifying any potential impacts of the incident or non-compliance	Refer to 13.1	N/A	Refer to 12.1	N/A Not Applicable at time of audit
13.4	c. the method and timing of any remedial action that will be undertaken by the approval holder.	Records of notifications to the Department specifying any the method and timing of any remedial action that will be undertaken by the approval holder	Refer to 13.1	N/A	Refer to 12.1	N/A Not Applicable at time of audit



EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
<b>EPBC Approval Condition 14</b>		The approval holder must ensure that independent audits of compliance with the conditions are conducted for the 12 month period from the date of this approval and for every subsequent 12 month period.				
14.1	The approval holder must ensure that independent audits of compliance with the conditions are conducted for the 12 month period from the date of this approval and for every subsequent 12 month period.	Independent Audit Reports.	This Compliance Audit Report was undertaken by an independent auditor. See Section 0 for independent auditor qualifications and declaration.	This document	The compliance audit and Compliance Audit Report for the 2023 reporting period was undertaken by an independent auditor.	Compliant (Y)
<b>EPBC Approval Condition 15</b>		For each independent audit, the approval holder must: <ul style="list-style-type: none"> <li>a. provide the name and qualifications of the independent auditor and the draft audit criteria to the Department;</li> <li>b. only commence the independent audit once the audit criteria have been approved in writing by the Department; and</li> <li>c. submit an audit report to the Department within the timeframe specified in the approved audit criteria.</li> </ul>				
15.1	For each independent audit, the approval holder must: <ul style="list-style-type: none"> <li>a. provide the name and qualifications of the independent auditor and the draft audit criteria to the Department</li> </ul>	Records of the name and qualifications of the independent auditor and draft audit criteria provided to the Department.	Argyle Cattle provided the name and qualifications of the independent auditor and the draft audit criteria to the Department on 7 June 2023.	[12] Email record of draft audit criteria provided to the Department	Records of the name and qualification of the independent auditor as well as the draft audit criteria was provided to the department on the 7 June 2023 via email.	Compliant (Y)
15.2	<ul style="list-style-type: none"> <li>b. only commence the independent audit once the audit criteria have been approved in writing by the Department</li> </ul>	Records of approval of the independent auditor and audit criteria in writing by the Department.	Approval of the independent auditor and the draft audit criteria was received by Argyle Cattle from the Department on 22 September 2023.	[13] Letter from DCCEEW to Argyle Cattle dated 22 September 2023	Approval of the independent auditor and audit criteria from the Department was provided on 22 September 2023 via email.	Compliant (Y)

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
15.3	c. submit an audit report to the Department within the timeframe specified in the approved audit criteria.	Records of the submission of independent Audit Reports submitted to the Department.	This Compliance Audit Report will be submitted to the Department within the period of 60 business days following the end of the reporting period.	This Compliance Audit Report	Not Applicable at time of audit	N/A Not Applicable at time of audit
<b>EPBC Approval Condition 16</b>		The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.				
16.1	The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval	Records of independent audit reports published on the website.	This Compliance Audit Report will be published on the website within 10 business days of receiving the department's approval.	This Compliance Audit Report	Not Applicable at time of audit	N/A Not Applicable at time of audit
<b>EPBC Approval Condition 17</b>		The approval holder may, at any time, apply to the Minister for a variation to an action management plan submitted as part of the assessment documentation for the action and required to be implemented under this approval, or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.				
17.1	The approval holder may, at any time, apply to the Minister for a variation to an action management plan submitted as part of the assessment documentation for the action and required to be implemented under this approval, or as subsequently revised in accordance with	Records of the submission and approval of a RAMP.  Review of records pertaining to the implementation of management provisions contained in the RAMP (if applicable).	A review of the OEMP and the DWROS indicated that there have been no variations to these plans during the reporting period.	[3] ACC (2002) Operational Environmental Management Plan revised 28/04/2022.  [8] Detailed Water Resource Operating Strategy (dated 17/07/2019)	Not Applicable at time of audit	N/A Not Applicable at time of audit

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.					
<b>EPBC Approval Condition 18</b>		The approval holder may choose to revise an action management plan required to be implemented under this approval, or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the RAMP would not be likely to have a new or increased impact.				
18.1	The approval holder may choose to revise an action management plan required to be implemented under this approval, or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the RAMP would not be likely to have a new or increased impact.	Review of records pertaining to the implementation of management provisions contained in the RAMP (if applicable). Review of impacts associated with the implementation of the RAMP.	A review of the OEMP and the DWROS indicated that there have been no variations to these plans during the reporting period.	[3] ACC (2002) Operational Environmental Management Plan revised 28/04/2022. [8] Detailed Water Resource Operating Strategy (dated 17/07/2019)	Not Applicable at time of audit	N/A Not Applicable at time of audit

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
<b>EPBC Approval Condition 19</b>		If the approval holder makes the choice under condition 18 to revise an action management plan without submitting it for approval, the approval holder must: <ul style="list-style-type: none"> <li>a. notify the Department in writing that the approved action management plan has been revised and provide the Department with:                             <ul style="list-style-type: none"> <li>i. an electronic copy of the RAMP;</li> <li>ii. an electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP;</li> <li>iii. an explanation of the differences between the approved action management plan and the RAMP;</li> <li>iv. the reasons the approval holder considers that taking the action in accordance with the RAMP would not be likely to have a new or increased impact; and</li> <li>v. written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the Department.</li> </ul> </li> <li>b. subject to condition 21, implement the RAMP from the RAMP implementation date.</li> </ul>				
19.1	If the approval holder makes the choice under condition 18 to revise an action management plan without submitting it for approval, the approval holder must: <ul style="list-style-type: none"> <li>a. notify the Department in writing that the approved action management plan has been revised and provide the Department with:</li> </ul>	Records of notification to the Department in writing that the approved action management plan has been revised.	A review of the OEMP and the DWROS indicated that there have been no variations to these plans during the reporting period.	[3] ACC (2002) Operational Environmental Management Plan revised 28/04/2022. [8] Detailed Water Resource Operating Strategy (dated 17/07/2019)	Not Applicable at time of audit	N/A Not Applicable at time of audit
19.2	<ul style="list-style-type: none"> <li>i. an electronic copy of the RAMP</li> </ul>	Records of the provision of an electronic copy of the RAMP to the Department.	Refer to 19.1	Refer to 19.1	Not Applicable at time of audit	N/A Not Applicable at time of audit

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
19.3	ii. an electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP	Records of the provision of an electronic copy of the RAMP to the Department with tracked changes.	Refer to 19.1	Refer to 19.1	Not Applicable at time of audit	N/A Not Applicable at time of audit
19.4	iii. an explanation of the differences between the approved action management plan and the RAMP	Records of the provision to the Department of an explanation of the differences between the approved action management plan and the RAMP.	Refer to 19.1	Refer to 19.1	Not Applicable at time of audit	N/A Not Applicable at time of audit
19.5	iv. the reasons the approval holder considers that taking the action in accordance with the RAMP would not be likely to have a new or increased impact	Records of the provision to the Department of the reasons the approval holder considers that taking the action in accordance with the RAMP would not be likely to have a new or increased impact	Refer to 19.1	Refer to 19.1	Not Applicable at time of audit	N/A Not Applicable at time of audit
19.6	v. written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the	Records of written notification of the date on which the approval holder will implement the RAMP (RAMP implementation date).	Refer to 19.1	Refer to 19.1	Not Applicable at time of audit	N/A Not Applicable at time of audit

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	revision of the action management plan, or a date agreed to in writing with the Department.					
19.7	If the approval holder makes the choice under condition 18 to revise an action management plan without submitting it for approval, the approval holder must: b. subject to condition 21, implement the RAMP from the RAMP implementation date.	Records of the implementation of management provisions contained in the RAMP (subject to condition 21).	Refer to 19.1	Refer to 19.1	Not Applicable at time of audit	N/A Not Applicable at time of audit
<b>EPBC Approval Condition 20</b>		The approval holder may revoke their choice to implement a RAMP under condition 18 at any time by giving written notice to the Department. If the approval holder revokes the choice under condition 18, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under condition 18.				
20.1	The approval holder may revoke their choice to implement a RAMP under condition 18 at any time by giving written notice to the Department. If the approval holder revokes the choice under condition 18, the approval holder must implement the action management plan in force immediately prior to	Records of written notification to the Department to revoke the RAMP. Records of the implementation of management provisions contained in the action management plan in force immediately prior to the revision undertaken under condition 18.	A review of the OEMP and the DWROS indicated that there have been no variations to these plans during the reporting period.	[3] ACC (2002) Operational Environmental Management Plan revised 28/04/2022. [8] Detailed Water Resource Operating Strategy (dated 17/07/2019)	Not Applicable at time of audit	N/A Not Applicable at time of audit

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	the revision undertaken under condition 18.					
<b>EPBC Approval Condition 21</b>		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 RAMP would be likely to have a new or increased impact, then: <ul style="list-style-type: none"> <li>a. condition 18 does not apply, or ceases to apply, in relation to the RAMP; and</li> <li>b. the approval holder must implement the action management plan specified by the Minister in the notice.</li> </ul>				
21.1	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 RAMP would be likely to have a new or increased impact, then: <ul style="list-style-type: none"> <li>a. condition 18 does not apply, or ceases to apply, in relation to the RAMP</li> </ul>	Records of written notification from the Minister that the taking of the action in accordance with the RAMP would be likely to have a new or increased impact and that Condition 18 does not apply, or ceases to apply, in relation to the RAMP	A review of the OEMP and the DWROS indicated that there have been no variations to these plans during the reporting period.	[3] ACC (2002) Operational Environmental Management Plan revised 28/04/2022. [8] Detailed Water Resource Operating Strategy (dated 17/07/2019)	Not Applicable at time of audit	N/A Not Applicable at time of audit
21.2	b. the approval holder must implement the action management plan specified by the Minister in the notice.	Records of the implementation of management provisions contained in the action management plan specified by the Minister in the notice.	Refer to 21.1	Refer to 19.1	Not Applicable at time of audit	N/A Not Applicable at time of audit
<b>EPBC Approval Condition 22</b>		At the time of giving the notice under condition 21, the Minister may also notify that for a specified period of time, condition 18 does not apply for one or more specified action management plans				
22.1	At the time of giving the notice under condition 21, the Minister may also notify that for a specified period of	Records of written notification from the Minister that the taking of the action in accordance with the RAMP would be likely to	A review of the OEMP and the DWROS indicated that there have been no variations to these plans during the reporting period.	[3] ACC (2002) Operational Environmental Management Plan revised 28/04/2022.	Not Applicable at time of audit	N/A Not Applicable at time of audit

EPBC Approval Condition		Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
	time, condition 18 does not apply for one or more specified action management plans	have a new or increased impact and that Condition 18 does not apply for one or more specified action management plans.		[8] Detailed Water Resource Operating Strategy (dated 17/07/2019)		
<b>EPBC Approval Condition 23</b>		Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.				
23.1	Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.	Notification to the Department in writing and the provision of completion data (an environmental report and spatial data relating to total clearing and the clearing of Bilby habitat) within 30 days after the completion of the action.	The action has not yet been completed as at 31 December 2023. Aerial imagery dated to October 2023 shows that no more 200 hectares of vegetation have been cleared.  5 out of 12 pivots have been cleared to date, as observed during the site visit (19/12/2023).	[1] Shamrock development Envelope KML file.	The action has not yet been completed as at 31 December 2023.	N/A Not Applicable at time of audit



Appendix B  
Operational Environmental Management Plan – Detailed Audit Findings

**Appendix B: Operational Environmental Management Plan – Detailed Audit Findings**

Audit Code	Subject / Management Action	Requirement	How	Evidence	Status	Further Information
FV1	Flora and Vegetation: Clearing <ul style="list-style-type: none"> <li>Demarcate and provide GPS co-ordinates of the development envelope and areas to be cleared to the clearing contractor prior to clearing</li> <li>Demarcate and provide GPS co-ordinates of Priority Flora populations to be protected (<a href="#">Appendix 2</a>) to the clearing contractor prior to clearing</li> </ul>	<ul style="list-style-type: none"> <li>No clearing of vegetation to occur outside the development envelope</li> <li>Clearing of native vegetation within the development envelope will not exceed 650 ha.</li> <li>Retain six populations of significant flora: <i>Tephrosia andrewii</i> population 1-4, <i>Polymeria</i> sp. Broome population 1-2 (as referred to in <a href="#">Appendix 2</a>)</li> </ul>	Weekly inspection along clearing boundaries during clearing to confirm that there is no exceedance of the identified targets	<ul style="list-style-type: none"> <li>Aerial imagery and/or clearing records</li> <li>Site inspection</li> </ul>	Compliant (Y)	The extent of the Project clearing has not exceeded the authorized extent of: <ul style="list-style-type: none"> <li>The development envelope</li> <li>650 ha within the development envelope</li> </ul> Review of the clearing envelope and developed pivots indicate that the six populations of significant flora: <i>Tephrosia andrewii</i> population 1-4, <i>Polymeria</i> sp. Broome population 1-2 were not disturbed during the development of Pivots 1 to 5.  Evidence [1] Shamrock Development Envelope KML file [14] Aerial imagery, disturbance footprint and Priority Flora locations reviewed during audit (19/12/23) Site inspection (19/12/2023).
FV2	Flora and Vegetation: Clearing <ul style="list-style-type: none"> <li>Demarcate and establish 100-200 metre square fenced vegetation buffers around each pivot</li> </ul>	<ul style="list-style-type: none"> <li>Establishment of fenced vegetation buffers will not exceed 550 ha</li> </ul>	Weekly inspection of buffer boundaries and extent during construction to confirm that there is no exceedance of the identified target	<ul style="list-style-type: none"> <li>Aerial imagery and/or clearing records</li> <li>Site inspection</li> </ul>	Non-compliant (N)	The fencing required under Provision FV2 has not been installed around the five pivots constructed to date. It was noted that the pivots are not currently used for intensive grazing and therefore there has been no disturbance from intensive grazing on the pivots or adjacent land. It was also noted that the entire paddock on which the pivots are located is fenced.  Evidence [1] Shamrock Development Envelope KML file Site inspection (19/12/2023).
FV3	Flora and Vegetation: Weeds <ul style="list-style-type: none"> <li>Undertake monitoring of crop and weed species outside of irrigation areas to detect spread into adjacent native vegetation.</li> <li>If monitoring identifies outbreaks of crop species, undertake weed control with a DBCA/DPIRD approved herbicide.</li> </ul>	<ul style="list-style-type: none"> <li>Spread of Rhodes Grass, other irrigation crops or weeds into remnant vegetation is limited to isolated occurrences of non-vigorous plants, no more than 300 m from pivots</li> </ul>	Annual wet/post-wet season weed monitoring along buffer boundaries and within adjacent native vegetation	<ul style="list-style-type: none"> <li>Monitoring records</li> <li>Site inspection</li> <li>Herbicide purchase and use records</li> </ul>	Non-compliant (N)	There is no evidence of the 2023 annual post wet season weed monitoring having been carried out. Informal visual inspections are carried out during operations. During the site inspection, it was noted that Rhodes Grass had not spread beyond the boundary of the irrigated area on the two irrigated pivots, Pivot 1 and 2.  Evidence Site inspection (19/12/2023). Discussion with General Manager of Operations (19/12/2023)
TF1	Fauna – Threatened Species <ul style="list-style-type: none"> <li>Minimise clearing of Bilby habitat as far as practicable and avoid clearing of high value habitat</li> <li>Demarcate and provide GPS co-ordinates of the development envelope and areas to be cleared to the clearing contractor prior to clearing</li> </ul>	<ul style="list-style-type: none"> <li>No clearing of Bilby habitat to occur outside the development envelope</li> <li>No clearing within 100 m of Bilby plots rated as high value habitat</li> </ul>	Weekly inspection along clearing boundaries during clearing to confirm that there is no exceedance of the identified targets	<ul style="list-style-type: none"> <li>Clearing records</li> <li>Site inspection</li> </ul>	Compliant (Y)	The Shamrock Development Envelope KML file shows that project clearing has not occurred outside of the development envelope. Clearing has occurred more than 100m from the edge of the development envelope.  Pre-clearing survey reports conducted by a qualified zoologist did not find evidence of Bilbies within the five pivot areas cleared to date

Audit Code	Subject / Management Action	Requirement	How	Evidence	Status	Further Information
						(S1PB01, S1PB02, S1PB03, S1PB05, S1PB06)  Evidence [1] Shamrock Development Envelope KML file [2] Pre-clearing Bilby survey reports
TF2	<p>Fauna – Threatened Species</p> <ul style="list-style-type: none"> <li>Undertake a pre-clearance survey for Bilby using an experienced fauna specialist in accordance with DBCA’s Guideline for the survey and relocation of Bilby in Western Australia (<a href="#">DBCA 2018b</a>): <ul style="list-style-type: none"> <li>Undertake searches for Bilby burrows and signs</li> <li>If potentially occupied burrows are identified, monitor burrows to determine occupancy. Undertake displacement at any burrows determined to be occupied</li> <li>If unoccupied burrows are identified, fill in to prevent potential for use prior to clearing</li> <li>If displacement is unsuccessful, undertake capture and relocate Bilby individuals to suitable habitat on Shamrock Station outside the development envelope</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>No Bilby mortality or active burrow destruction during clearing</li> </ul>	<ul style="list-style-type: none"> <li>Visual observations for Bilby burrows and Bilby signs during pre-clearance survey</li> <li>Pre-clearance survey within two weeks prior to clearing</li> <li>Motion camera trapping for up to three nights at suspected occupied burrows</li> </ul>	<ul style="list-style-type: none"> <li>Bilby relocation records (e.g. correspondence for engagement of fauna specialist; post-inspection / relocation report or correspondence)</li> <li>Site inspection</li> </ul>	Compliant (Y)	<p>Pre-clearing surveys were conducted across all planned pivot areas by a qualified zoologist. Pre-clearing survey reports conducted did not find evidence of Bilbies within the five pivot areas cleared to date (S1PB01, S1PB02, S1PB03, S1PB05, S1PB06).</p> <p>Evidence [2] Pre-clearing Bilby survey reports</p>
TF3	<p>Fauna – Threatened Species</p> <ul style="list-style-type: none"> <li>If recent Bilby activity is identified in the clearing area, engage a fauna spotter to traverse the project area ahead of clearing machinery during clearing. The fauna spotter will have appropriate training in fauna handling techniques and hold a permit to relocate fauna in accordance with the <i>Biodiversity Conservation Regulations 2018</i></li> </ul>	<ul style="list-style-type: none"> <li>No Bilby mortality or active burrow destruction during clearing</li> </ul>	Fauna clearance survey	<ul style="list-style-type: none"> <li>Clearing records / Contractor records</li> </ul>	Compliant (Y)	<p>Pre-clearing surveys were conducted across all planned pivot areas by a qualified zoologist. Pre-clearing survey reports conducted did not find evidence of Bilbies within the five pivot areas cleared to date (S1PB01, S1PB02, S1PB03, S1PB05, S1PB06).</p> <p>Evidence [2] Pre-clearing Bilby survey reports</p>
TF4	<p>Fauna – Feral species</p> <ul style="list-style-type: none"> <li>Undertake an initial feral cat and fox trapping survey within the control area (see Appendix 3) to mitigate risk to Bilbies and inform future feral cat and fox control</li> <li>Undertake annual monitoring of feral cats, foxes and rabbits within the control area (see Appendix 3) to assess presence and abundance/activity level of each species</li> <li>Undertake feral cat and fox control within the control area</li> <li>Undertake rabbit control within the control area if monitoring detects presence</li> </ul>	<ul style="list-style-type: none"> <li>Demonstrated decrease in introduced predators (feral cats, or foxes) in the control area compared with the baseline</li> <li>No introduction of rabbits to the control area as a result of the Project</li> </ul>	<ul style="list-style-type: none"> <li>Annual monitoring and control program</li> <li>Monitoring and control methods as outlined in Appendix 3</li> </ul>	<ul style="list-style-type: none"> <li>Feral fauna survey reports</li> <li>Feral fauna monitoring data / reports</li> <li>Feral fauna control records</li> </ul>	Compliant (Y)	<p>An initial feral fauna survey within the control area was undertaken in November 2019. Surveillance monitoring and feral fauna control were undertaken in 2021, 2022 and 2023 and are ongoing.</p> <p>Evidence [15] Initial feral fauna trapping survey (November 2019, Phoenix Environmental Sciences) [16] Shamrock_Introduced animal monitoring_2021_v0 baseline [17] Feral Fauna Control Records 2022 [18] Shamrock_Introduced animal</p>

Audit Code	Subject / Management Action	Requirement	How	Evidence	Status	Further Information
						monitoring_2022_v0 [19] Shamrock Station Irrigation Project Introduced Animal Monitoring October 2023 (Boyle, A. 2023)
HP1	Inland Waters – Abstraction <ul style="list-style-type: none"> <li>Manage abstraction so that groundwater allocation is not exceeded</li> </ul>	<ul style="list-style-type: none"> <li>No exceedance of annual licensed groundwater allocation</li> </ul>	<ul style="list-style-type: none"> <li>Monthly flowmeter readings and volume calculations at all operating production bores, any new/replacement production bores</li> </ul>	<ul style="list-style-type: none"> <li>Groundwater abstraction records / reports to DWER</li> </ul>	Compliant (Y)	Water abstraction records indicate that abstraction during the reporting period is less than the licensed limit under groundwater license GWL203109(1). It is noted that only five out of twelve planned pivots have been constructed to date, therefore the water demand is considerably less than required by the full-scale development.  Evidence: [20] DWER meter reading export 18_01_2024.xls file. [21] Shamrock Station 2023 Annual GWL Report
HP2	Inland Waters – Groundwater Dependent Ecosystems <ul style="list-style-type: none"> <li>Manage abstraction so that groundwater use does not impact GDEs (Injudinah Swamp)</li> </ul>	<ul style="list-style-type: none"> <li>Groundwater drawdown to be within acceptable limits so as not to impact ecological function of identified GDEs (Injudinah Swamp)</li> </ul>	<ul style="list-style-type: none"> <li>Quarterly monitoring of groundwater levels at monitoring bore 17MB003S&amp;I (Stage 1B) (Dec/Jan, Mar/Apr, Jun/Jul, Sep/Oct)</li> <li>Quarterly monitoring of surface water levels at Injudinah Swamp Claypan (Stage 1C) (Dec/Jan, Mar/Apr, Jun/Jul, Sep/Oct)</li> <li>Hourly pressure transducer, electrical conductivity and pH monitoring at Injudinah Swamp Claypan (Stage 1C) (ongoing)</li> <li>Quarterly (for first year) comprehensive water quality analysis of surface water quality and Injudinah Swamp Claypan (Stage 1C) (Dec/Jan, Mar/Apr, Jun/Jul, Sep/Oct)</li> <li>Vegetation monitoring of established transects (potential impact and control sites) at Injudinah Swamp, bi-annually if water level triggered, end of dry season and during irrigation season (e.g. July)</li> </ul>	<ul style="list-style-type: none"> <li>Groundwater monitoring records / reports to DWER</li> <li>GDE monitoring records / reports</li> </ul>	Compliant (Y)	Water abstraction records indicate that abstraction during the reporting period is less than the licensed limit under groundwater license GWL203109(1). It is noted that only five out of twelve planned pivots have been constructed to date, therefore the water demand is considerably less than required by the full-scale development.  The Annual Groundwater Report (IGS, 2024) indicated that there have been no observable changes in groundwater levels at monitoring sites since the start of irrigation that could be attributed to ACC’s activity, and that groundwater trends appear to be driven by large rainfall events.  It is noted that off-site monitoring bores 17MB003S&I (and 17MB004) have not yet been installed and that surface water monitoring at Injudinah Swamp has not commenced due to access restrictions imposed by the Traditional Owners. ACC is continuing to negotiate with the Traditional Owners to obtain access for groundwater and surface water monitoring purposes. It is also noted that DWER has advised ACC that no more than 3.16GL per annum may be abstracted without the installation of off-site monitoring bores 17MB003S&I and 17MB004. ACC’s abstraction during the 2023 reporting period was 0.83GL.  Evidence: [20] DWER meter reading export 18_01_2024.xls

Audit Code	Subject / Management Action	Requirement	How	Evidence	Status	Further Information
						file. [21] Shamrock Station 2023 Annual GWL Report [22] Letter DWER to ACC offsite groundwater monitoring (22/04/2022) Discussion with General Manager of Operations and Executive Services Manager (19/12/2023)
HP3	Inland Waters – Groundwater Quality <ul style="list-style-type: none"> <li>Manage fertiliser application and abstraction so that groundwater quality is not impacted</li> </ul>	<ul style="list-style-type: none"> <li>Maintain groundwater quality and salinity</li> </ul>	Annual comprehensive water quality analysis of pumped groundwater sampled from: <ul style="list-style-type: none"> <li>production bores - which production bores to be annually sampled will be agreed upon once bores have been constructed - at a minimum all westernmost pivots must be sampled</li> <li>monitoring bores 15LAG8S&amp;I, 15LAG7S&amp;I, 17MB002S (Stage 1A) and 17MB001S&amp;I (Stage 1B) (Sept/Oct)</li> <li>Field pH measured quarterly in monitoring bores for the first year of operation 17MB002S, 15LAG7S&amp;I and 15LAG8S&amp;I (Stage 1A), 17MB001S&amp;I and 7MB003S&amp;I (Stage 1B)</li> </ul>	<ul style="list-style-type: none"> <li>Groundwater monitoring records / reports to DWER</li> </ul>	Compliant (Y)	The 2023 Annual Groundwater Report (IGS, 2024) indicated that whilst irrigation has commenced, it is not considered likely that any changes to groundwater chemistry would be detectable in such a short timeframe and therefore the additional chemistry data collected during 2023 continues to build the baseline groundwater chemistry dataset at the project site. Chemistry samples were similar to previous results. The monthly in-situ EC and pH measurements from the production bores show no significant changes over time or trends attributable to the pumping regime  Evidence [21] Shamrock Station 2023 Annual GWL Report
HP4	Inland Waters – Groundwater Quality <ul style="list-style-type: none"> <li>Manage abstraction so that saline wedge movement does not impact GDEs (Injudinah Swamp) and other users' water supply</li> </ul>	<ul style="list-style-type: none"> <li>Movement of saltwater interface to remain within predicted range</li> </ul>	Monitoring of electrical conductivity <ul style="list-style-type: none"> <li>all operating production bores monthly</li> <li>logged data in 15LAG8S&amp;I, 15LAG7S (Stage 1A), 17MB001S, 17MB001I (Stage 1B) and 17MB003S, 17MB003I (Stage 1C)</li> <li>Quarterly monitoring of water level in monitoring bores 17MB002D, 17MB004 and 15LAG06D</li> </ul>	<ul style="list-style-type: none"> <li>Groundwater monitoring records / reports to DWER</li> </ul>	Compliant (Y)	The Annual Groundwater Report (IGS, 2024) indicated that there have been no observable changes in groundwater levels at monitoring sites since the start of irrigation that could be attributed to ACC's activity, and that groundwater trends appear to be driven by large rainfall events The monthly in-situ EC and pH measurements from the production bores show no significant changes over time or trends attributable to the pumping regime.  Evidence [21] Shamrock Station 2023 Annual GWL Report

Appendix C  
Detailed Water Resource Operating Strategy – Detailed Audit Findings

**Appendix C: Detailed Water Resource Operating Strategy – Detailed Audit Findings**

Audit Code	Subject	Requirement	How	Evidence	Status	Further Information
1	Reporting	The licensee will carry out and report to the department on the following: <ul style="list-style-type: none"> <li>Shamrock Station Irrigation Project Stage 1 Monitoring Plan, and</li> <li>Shamrock Station Irrigation Project Stage 1 Management Response Plan</li> </ul>	<ul style="list-style-type: none"> <li>Groundwater monitoring in accordance with the Shamrock Station Irrigation Project Stage 1 Monitoring Plan</li> <li>Adaptive management in accordance with Shamrock Station Irrigation Project Stage 1 Management Response Plan</li> </ul>	<ul style="list-style-type: none"> <li>Groundwater monitoring records / reports to DWER</li> <li>Interview with General Manager of Operations (19/12/2023)</li> </ul>	Compliant (Y)	The Annual Groundwater Monitoring Report for 2023 was completed in January 2024 by Innovative Groundwater Solutions (IGS, 2024). Monthly and annual groundwater monitoring was carried out in accordance with the Shamrock Station Irrigation Project Stage 1 Monitoring Plan. No adaptive management response was required at the Shamrock Station Irrigation project during 2023.  Evidence [21] Shamrock Station 2023 Annual GWL Report
2	Meter Installation	<ul style="list-style-type: none"> <li>Install a meter on each water draw-point through which water is taken under the licence</li> <li>When installing meters ensure compliance with the Rights in Water and Irrigation (Approved Meters) Order 2009; and for each meter installed</li> <li>Maintain the meter in good condition and ensure that it is operating within a range of plus or minus 5% of the quantity of water that passes through it when tested in field conditions</li> <li>Notify DWER within 7 days of detecting a malfunction of the meter</li> <li>Record the meter reading at the end of each month and provide a copy of the meter readings to DWER within 30 days of the water year (see water year condition on licence)</li> <li>Submit meter reads to DWER via the online system called Water Online</li> <li>Within 30 days of the installation of meters, submit to DWER the information listed in section 41C(2) of the Rights in Water and Irrigation Amendment Regulations 2018</li> </ul>	<ul style="list-style-type: none"> <li>Installation of groundwater abstraction meters in accordance with Rights in Water and Irrigation (Approved Meters) Order 2009</li> </ul>	<ul style="list-style-type: none"> <li>Groundwater monitoring records / reports to DWER</li> <li>Interview with General Manager of Operations (19/12/2023)</li> </ul>	Compliant (Y)	Water abstraction records indicate that meters have been installed on each water draw point. AVFI meters have been installed at each water draw-point under the license and abstraction volumes from 2020- 2023 have been provided. Evidence: [20] DWER meter reading export 18_01_2024.xls file. [21] Shamrock Station 2023 Annual GWL Report
3	Baseline vegetation condition	<ul style="list-style-type: none"> <li>Baseline vegetation condition established prior to Stage 1 abstraction commencing.</li> </ul>	<ul style="list-style-type: none"> <li>Baseline vegetation condition survey conducted by suitably qualified botanist prior to Stage 1 abstraction commencing</li> </ul>	<ul style="list-style-type: none"> <li>Baseline Vegetation Report</li> </ul>	Compliant (Y)	Baseline vegetation survey was undertaken at Injudinah Swamp on the 25-27 <sup>th</sup> of November 2017.  Evidence [22] Injudinah Swamp baseline vegetation assessment and installation of vegetation health monitoring transects for the Shamrock Station Irrigation Project, October 2018, Phoenix Environmental Sciences
4	Biannual vegetation monitoring	<ul style="list-style-type: none"> <li>Bi-annual vegetation monitoring (end of dry season and during irrigation season, e.g., July) for early detection where groundwater level trigger exceeded.</li> </ul>	<ul style="list-style-type: none"> <li>Bi-annual vegetation monitoring (end of dry season and during irrigation season, e.g., July)</li> </ul>	<ul style="list-style-type: none"> <li>Groundwater monitoring data</li> <li>Biannual vegetation monitoring reports</li> </ul>	Compliant (Y)	Groundwater level monitoring indicated that the groundwater level trigger was not exceeded during 2022 and therefore, biannual vegetation monitoring during 2023 was not triggered.  Evidence [21] Shamrock Station 2023 Annual GWL Report [23] Shamrock Station 2022 Annual GWL Report

Audit Code	Subject	Requirement	How	Evidence	Status	Further Information
5	Annual water monitoring	<ul style="list-style-type: none"> <li>An annual water monitoring summary will be prepared at the end of each subsequent water use year in accordance with DWER Operational Policy 5.12 Hydrogeological reporting associated with a groundwater well licence (DoW 2009a, 2012).</li> </ul>	<ul style="list-style-type: none"> <li>Annual water monitoring summary prepared in accordance with DWER Operational Policy 5.12 Hydrogeological reporting associated with a groundwater well licence (DoW 2009a, 2012).</li> </ul>	<ul style="list-style-type: none"> <li>Annual water monitoring summary report</li> </ul>	Compliant (Y)	Annual water monitoring reports were prepared for the 2022 and 2023 calendar years.  Evidence [21] Shamrock Station 2023 Annual GWL Report [23] Shamrock Station 2022 Annual GWL Report
6	Triennial water monitoring review	A triennial water monitoring review will be prepared in accordance with DWER Operational Policy 5.12 and due 3 months following the end of the water year, beginning in March 2022 and every 3 years after. A water monitoring summary will not be due in these years.	<ul style="list-style-type: none"> <li>Triennial water monitoring review prepared in accordance with DWER Operational Policy 5.12</li> </ul>	<ul style="list-style-type: none"> <li>Triennial water monitoring review</li> </ul>	N/A Not Applicable at time of audit	Not required for this reporting period.



## Appendix D Evidence Reviewed

## **Evidence Reviewed**

- [1] Shamrock Development Envelope KML file
- [2] Pre-clearing Bilby survey reports
- [3] ACC (2002) Operational Environmental Management Plan revised 28/04/2022.
- [4] Shamrock Introduced animal monitoring 2021 v0 baseline
- [5] Feral Fauna Control Records 2022
- [6] Shamrock Introduced animal monitoring 2022 v0
- [7] Shamrock Station Irrigation Project Introduced Animal Monitoring October 2023 (Boyle, A. 2023)
- [8] Detailed Water Resource Operating Strategy (dated 17/07/2019)
- [9] Commencement date for Shamrock Irrigation Project email chain
- [10] EPBC 2017/8004 Shamrock Station Irrigation Project Annual Compliance Report 2021
- [11] EPBC 2017/8004 Shamrock Station Irrigation Project Annual Compliance Report 2022
- [12] Email record of draft audit criteria provided to the Department
- [13] Letter from DCCEEW to Argyle Cattle dated 22 September 2023
- [14] Aerial imagery, disturbance footprint and Priority Flora locations reviewed during audit (19/12/23)
- [15] Initial feral fauna trapping survey (November 2019, Phoenix Environmental Sciences)
- [16] Shamrock\_Introduced animal monitoring\_2021\_v0 baseline
- [17] Feral Fauna Control Records 2022
- [18] Shamrock\_Introduced animal monitoring\_2022\_v0
- [19] Shamrock Station Irrigation Project Introduced Animal Monitoring October 2023 (Boyle, A. 2023)
- [20] DWER meter reading export 18\_01\_2024.xls file.
- [21] Shamrock Station 2023 Annual GWL Report
- [22] Letter DWER to ACC offsite groundwater monitoring (22/04/2022)
- [23] Shamrock Station 2022 Annual GWL Report
- [24] Shamrock station- Argyle Cattle Company website (<https://www.argylecattle.com.au/shamrock-station>)