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# 2023 Shamrock Station Irrigation Project Compliance Assessment Report



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## Ministerial Statement 1086 Shamrock Station Irrigation Project

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## Abbreviations

<b>Acronym</b>	<b>Definition</b>
ACC	Argyle Cattle Company Pty Ltd
CAP	Compliance Assessment Plan
CAR	Compliance Assessment Report
CEO	Chief Executive Officer
DBCA	Department of Biodiversity Conservation and Attractions
DWER	Department of Water and Environmental Regulation
EP Act	Environmental Protection Act 1986
FIRB	Foreign Investment Review Board
MS1086	Ministerial Statement 1086
OEMP	Operational Environmental Management Plan

# 1. Introduction

## 1.1 Project Background

Argyle Cattle Company Pty Ltd's (ACC) Shamrock Station Irrigation Project (The Project) comprises a 12-pivot irrigation project for the production of irrigated pasture. The Project is situated 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 (Figure 1, Figure 2).

The Project comprises:

- Two approximately 40ha pivots that are under active irrigation and cropping;
- Three approximately 40ha pivots that have been cleared but are not yet irrigated;
- Seven proposed approximately 40ha pivots to be developed in the future;
- Twelve groundwater abstraction bores (five already established) drawing from the Broome Sandstone Aquifer;
- 17 monitoring bores (11 already established); and
- Support infrastructure such as sheds, bulk fuel and fertiliser storage, pipelines, bores and access roads.

The approved project footprint comprises 650ha of native vegetation clearing and a further 550ha of native vegetation disturbance by pastoral grazing. Implementation of the Project commenced on 15/06/2021. To date, only the two irrigated pivots are active and have been cropped for hay. The pivots are not currently under intensive grazing.

Ramboll Australia Pty Ltd (Ramboll) was engaged to undertake an independent compliance audit of the ACCs Irrigated Agriculture Project against Ministerial Statement 1086 (MS1086) for the reporting period 19 November 2022 to 18 November 2023. This Compliance Assessment Report (CAR) addresses condition 4.6 of MS1086, which requires ACC to submit a CAR to the Chief Executive Officer (CEO) of the Department of Water and Environment Regulation (DWER) by the 19th of February of each year i.e. within fifteen months after the release of MS1086 and then annually thereafter.

## 1.2 Project Approvals

ACC's Irrigation Project is authorised under the *Environmental Protection Act 1986* (EP Act) through Ministerial Statement 1086, published on the 19<sup>th</sup> of November 2018.



**Figure 1 Shamrock Irrigation Project Regional Location (from MS1086)**

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**Figure 2 Shamrock Irrigation Project Development Envelope and Indicative Footprint**

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### 1.3 Proponent details

The Proponent’s details are presented in Table 1.

**Table 1 Proponent Details**

Proponent	Address	Statement	Australian Company Number	Statement #
Argyle Cattle Company Pty Ltd	534 Wickham Hill Road, Kuitpo SA 5201	SHAMROCK STATION IRRIGATION PROJECT	613 455 379	1086



## 2. Implementation Status

### 2.1 Project Milestones

Implementation of the Project commenced on 15/06/2021. As at December 2023, five of the twelve pivots have been developed and two are under active irrigation and cropping. During the reporting period of 19 November 2022 to 18 November 2023, the following key milestones were achieved:

- Crop management was carried out to optimise crop production.
- Sorghum and rhodes grass were sown, grown, baled, transported, and then fed to the cattle on ACC stations during the mustering season.
- An Executive Services Manager was appointed in May 2023, whose responsibilities include administration of MS1086 and the associated Operational Environmental Management Plan (OEMP).
- Groundwater monitoring on site continued during the audit period at bores owned by Argyle and at DWER-owned bores in the vicinity.
- The Feral fauna monitoring and control program was maintained.

ACC's portfolio of cattle stations, including Shamrock, is subject to a sale agreement, which is yet to receive regulatory approval and review by the Foreign Investment Review Board (FIRB). The successful completion of the sale would be expected to facilitate completion of the remaining Shamrock Project pivots.

### 2.2 Project issues

During the reporting period, issues that influenced ACC's operations and the implementation of its OEMP comprised:

- Negotiations with the Traditional Owners for access to install groundwater monitoring bores 17MB003S&I and 17MB004 and undertake surface water monitoring are ongoing. To date, access for environmental monitoring purposes has not yet been granted. It is 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.

### 3. Statement of Compliance

#### 3.1 Proposal and Proponent Details

Proposal Title	SHAMROCK STATION IRRIGATION PROJECT
Statement Number	1086
Proponent Name	Argyle Cattle Company Pty Ltd
Proponent's Australian Company Number <i>(where relevant)</i>	613 455 379

#### 3.2 Statement of Compliance Details

Reporting Period	From 19 November 2022 to 18 November 2023						
Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	<input type="checkbox"/>	Construction	<input type="checkbox"/>	Operation	<input checked="" type="checkbox"/>	Decommissioning	<input type="checkbox"/>
Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:						Appendix 1 Appendix 2	
Were all implementation conditions and/or procedures of the Statement complied with within the reporting period? (please tick ✓ the appropriate box)							
No	<input type="checkbox"/>	Yes (please proceed to Section 4)	<input checked="" type="checkbox"/>				

#### 3.3 Details of Non-compliance(s) and/or Potential Non-compliance(s)

##### Non-compliance/potential non-compliance 3-1

Which implementation condition or procedure was non-compliant or potentially non-compliant?
Operational Environmental Management Plan Provision FV2: Demarcate and establish 100-200 metre square fenced vegetation buffers around each pivot Provision FV3: Undertake monitoring of crop and weed species outside of irrigation areas to detect spread into adjacent native vegetation
Was the implementation condition or procedure non-compliant or potentially non-compliant?
Potentially Non-Compliant

On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
The potential non-compliances were identified during an independent audit undertaken by Ramboll for the preparation of this CAR	
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Reported to DWER verbally      Date _____ <input type="checkbox"/> Reported to DWER in writing      Date 21/12/2023	<input type="checkbox"/> No
What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?	
<p>Provision FV2: Fences were not installed around each of the pivots constructed to date. However, 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 there has been no intensive grazing to date, there has been no environmental impact. As intensive grazing is not planned to occur in the foreseeable future, there is no practical requirement to install the fencing at the present time. It was noted during the audit that the boundary of the paddock that is subject to MS 1086 is fenced.</p> <p>Provision FV3: Weed monitoring has not yet commenced as set out under Provision FV3 of the OEMP. It was noted during the independent audit that the crop (Rhodes Grass) was growing to the edges of the two pivots that are currently under irrigation (Pivots 1 and 2). The spread of Rhodes Grass beyond the boundaries of the irrigated area was not observed at the time of the audit.</p>	
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)	
At the boundaries of the five pivots developed to date.	
What was the cause(s) of the non-compliance or potential non-compliance?	
<p>Provision FV2: A lack of clarity in the OEMP regarding the timing of 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.</p> <p>Provision FV3: In May 2023, Argyle appointed a new Executive Services Manager whose responsibilities include administration of MS1086. The lack of weed monitoring was indicated to be due to a lack of familiarity with the requirement to undertake the weed monitoring.</p>	
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?	
<p>Provision FV2: Argyle proposes to clarify with 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 to the effect that fencing would only be installed around each pivot in the event that intensive grazing was 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.</p> <p>Provision FV3: Argyle 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.</p>	

What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?

Argyle's Executive Services Manager proposes to create an Environmental Obligations Register to assist with managing compliance with MS1086 and the associated OEMP.

### 3.4 Proponent Declaration

I, Haydn Sale, General Manager, declare that I am authorised on behalf of ARGYLE CATTLE COMPANY PTY LTD to submit this form and that the information contained in this form is true and not misleading.

Signature:



Date: 13 February 2024

## 4. Details of Declared Compliance Status

### 4.1 Audit Methodology

#### 4.1.1 Audit Criteria

To satisfy condition's 4-1 and 4-2 of MS1086, ACC prepared and submitted a Compliance Assessment Plan (CAP) to the CEO of the DWER on the 6 of February 2019. The CAP includes an audit table, which comprises the audit criteria that was utilised during the audit and in the preparation of this audit report. These audit criteria include:

- MS1086 Audit Table requirements (Appendix 1); and
- Proponent OEMP Commitments (Appendix 2).

ACC's OEMP was first issued on January 2020 and revised in March 2020. The OEMP was subsequently revised in April 2022, which remains in force. The audit criteria used to assess compliance against Proponent OEMP commitments (Appendix 2) are based on the 2022 OEMP.

#### 4.1.2 Purpose and Scope

The purpose of the audit was to assess ACC's compliance against conditions outlined in MS1086 for the reporting period of 19 November 2022 to 18 November 2023, with the inclusion of an assessment of the Shamrock Station Irrigation Project Operational Environmental Management Plan (ACC 2022), and to develop a CAR to satisfy condition 4.6 of the statement which specifies:

*The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO.*

#### 4.1.3 Methodology

The audit was undertaken by John Nielsen, Lead Consultant from Ramboll. John is an accredited Principal Environmental Management Systems Auditor with Exemplar Global (Certification Number 14608).

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 key documents reviewed during the audit are listed in Appendix 3. The following ACC representatives participated in the audit either through interviews or the supply of documentary evidence.

- Ben Mills, Shamrock Station General Manager, Argyle Cattle Company;
- Caitlin Mills, Shamrock Station Assistant Manager, Argyle Cattle Company; and
- Yolande Ledgerwood, Executive Services Manager, Argyle Cattle Company.

#### 4.1.4 Assessment of Compliance/Terminology

The audit findings are classified in accordance with the definitions provided in Table 2. These definitions are consistent with the OEPA guideline *Post Assessment Guideline for preparing an audit table* (OEPA 2012) and in the approved CAP.

**Table 2 Compliance Status Definitions (OEPA 2012)**

<b>Compliance Status</b>	<b>Acronym</b>	<b>Definition</b>
Compliant	C	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.
Not Audited	NA	Not Audited.
Non-Compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of this audit element.
Potential Non-Compliance	PNC	Possible or likely failure to meet the requirements of the audit element.
Not Required at this stage	NR	The requirements of the audit element were not triggered during the reporting period.
In Process	IP	Where an audit element requires a management or monitoring plan be submitted to the OEPA or another government agency for approval, that submission has been made and no further information or changes have been requested by the OEPA or the other government agency and assessment by the OEPA or other government agency for approval is still pending.



## 4.2 Audit Results

### 4.2.1 Summary

A total of 31 elements were audited comprising twenty (20) MS1086 conditions (Appendix 1) and eleven (11) Proponent OEMP commitments (Appendix 2). The audit found the following:

- 19 elements were assessed as compliant (C);
- 5 elements were assessed as completed (CLD);
- 5 elements were assessed as not required at this stage (NR);
- 0 elements were assessed as being non-compliant (NC); and
- 2 elements were assessed as potentially non-compliant (PNC); and
- 0 elements were assessed as being in process (IP).

Table 3 below summarises the audit findings. The detailed audit findings of compliance against MS1086 conditions and Proponent EMP commitments are presented in Appendix 1 and Appendix 2, respectively.

**Table 3 Summary of audit findings in relation to MS1086 conditions and EMP commitments**

Compliance Status	MS1086 Conditions (Appendix 1)	Proponent EMP Commitments (Appendix 2)
Compliant	11	8
Completed	5	0
Not Audited	0	0
Non-Compliant	0	0
Potential Non-Compliance	0	2
Not Required at this stage	4	1
<b>Total</b>	<b>20</b>	<b>11</b>

### 4.2.2 Ministerial Statement 1086 Audit Table Compliance

Refer to Appendix 1 for full details of compliance with the MS1086 Audit Table.

### 4.2.3 Environmental Management Plan Compliance

Refer to Appendix 2 for full details of compliance with Shamrock Station Irrigation Project Operational Environmental Management Plan 28 April 2022 (ACC 2022).

### 4.2.4 Supporting Documentation

Supporting documentation reviewed to verify compliance status is provided in Appendix 3.

## 5. Proposed Changes to CAP

No changes to the CAP are proposed at the present time.

## 6. References

ACC. 2022. *Shamrock Station Irrigation Project Operational Environmental Management Plan*. Prepared by Argyle Cattle Company Pty Ltd, Broome, Western Australia.

OEPA. 2012. *Post-assessment Guideline for Preparing a Compliance Assessment Report*. Office of the Environmental Protection Authority, Perth, Western Australia.

# **Appendix 1**

## **Ministerial Statement Audit Results**

- Phases that apply in this table = Pre-Construction, Construction, Operation, Decommissioning, Overall (several phases).
- Code prefixes: M = Minister’s condition, P = Proponent’s commitment.
- Acronyms list: CEO = Chief Executive Officer of DWER; DBCA = Department of Biodiversity, Conservation and Attractions, DEC = Department of Environment Regulation; DPAW = Department of Parks and Wildlife; DIA = Department of Indigenous Affairs; DMP = Department of Mining and Petroleum; DMIRS = Department of Mines, Industry regulation and Safety, DWER = Department of Water and Environmental Regulation; EPA = Environmental Protection Authority; DoH = Department of Health; DoW = Department of Water, Minister for Env = Minister for the Environment; OEPA = Office of the Environmental Protection Authority.
- Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non – compliant, NR = Not Required at this stage. Please note the terms VR = Verification Required and IP = In Process are only for DWER use.
- This audit table is a summary and timetable of conditions and commitments applying to this project. Refer to the Minister’s Statement for full detail/precise wording of individual elements

**Appendix 1 Ministerial Statement 2023 Audit Results**

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1086:M1.1	Proposal Implementation	When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Table 2 of Schedule 1, unless amendments to the proposal and the authorised extent of the proposal have been approved under the EP Act.	Implement proposal as described in Schedule 1.	Annual CAR.	Overall	Ongoing	C	Aerial imagery shows that less than 650 hectares of vegetation has been cleared (only five out of twelve 40ha pivots have been cleared to date). A site visit observed that the pivots and surrounding native vegetation are not subject to intensive grazing and therefore none of the approved 550ha of native vegetation has been disturbed through grazing.  Evidence [1] Shamrock Development Envelope KML file Site inspection 19/12/2023.
1086:M2.1	Contact Details	The proponent shall notify the CEO of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.	Submit written notification to the CEO.	Written notification to the CEO.	Overall	Ongoing	C	No change of address has occurred during the audit period
1086:M3.1	Time Limit for Substantial Commencement	The proposal must be substantially commenced within five (5) years from the date of this Statement.	Commence substantial implementation of the proposal by 19 November 2023.	Written notification to the CEO.	Construction	By 19 November 2023	CLD	Project clearing and construction commenced on the 15 <sup>th</sup> of June 2021.  Evidence [2] Commencement date for Shamrock Irrigation Project [03] Shamrock Station Irrigation Project CAR 2022 [04] Shamrock Station Irrigation Project CAR 2023
1086:M3.2	Time Limit for Substantial Commencement	The proponent must provide to the CEO documentary evidence demonstrating that it has complied with condition 3-1 no later than thirty (30) days after expiration of five (5) years from the date of this Statement.	Provide written evidence of substantial commencement of proposal implementation on or before 19 December 2023.	Written notification to the CEO.	Construction	By 19 December 2023	CLD	Project clearing and construction commenced on the 15 <sup>th</sup> of June 2021.  Evidence [2] Commencement date for Shamrock Irrigation Project [3] Shamrock Station Irrigation Project CAR 2022 [4] Shamrock Station Irrigation Project CAR 2023
1086:M4.1	Compliance Reporting	The proponent shall prepare and maintain a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 4-6, or prior to	Prepare a CAP and submit to the CEO for approval.	CAP. CEO approval of CAP.	Pre-construction	By 19 August 2019 or prior to implementation of the proposal, whichever is sooner.	CLD	The Compliance Assessment Plan was submitted by Argyle Cattle and approved by DWER in February 2019.  Evidence: [5] Shamrock Station Irrigation Project Compliance Assessment Plan Ministerial Statement :1086 (Phoenix Environmental Sciences, dated 06/02/2019)

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		implementation of the proposal, whichever is sooner.						
1086:M4.2	Compliance Reporting	The Compliance Assessment Plan shall indicate: (1) the frequency of compliance reporting; (2) the approach and timing of compliance assessments; (3) the retention of compliance assessments; (4) the method of reporting of potential non-compliances and corrective actions taken; (5) the table of contents of Compliance Assessment Reports; and (6) public availability of Compliance Assessment Reports.	Prepare and submit to the CEO a CAP addressing all requirements.	CAP. CEO approval of CAP.	Overall	Ongoing	C	The Compliance Assessment Plan was submitted by Argyle Cattle and approved by DWER in February 2019.  Evidence: [5] Shamrock Station Irrigation Project Compliance Assessment Plan Ministerial Statement :1086 (Phoenix Environmental Sciences, dated 06/02/2019)
1086:M4.3	Compliance Reporting	After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of condition 4-2 the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 4-1.	Undertake annual compliance assessments in accordance with the approved CAP.	Annual CAR.	Overall	After receiving notice in writing from the CEO that the CAP satisfies the requirements of condition 4-2.	C	This 2023 Compliance Assessment Report (CAR) is the third CAR submitted for MS1086 and provides evidence of the Proponent's assessment of compliance for the period 19 November 2022 to 18 November 2023. A CAR was previously submitted for the 2021-2022 and 2022-2023 reporting periods.  Evidence: [3] Shamrock Station Irrigation Project CAR 2021 [4] Shamrock Station Irrigation Project CAR 2022 [6] Shamrock Station Irrigation Project CAR 2023 (this CAR)
1086:M4.4	Compliance Reporting	The proponent shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by condition 4-1 and shall make those reports available when requested by the CEO.	Retain annual CARs in Accordance with approved CAP. Make CARs available to CEO on request. the	Annual CAR.	Overall	Ongoing	C	CARs are stored on ACC's electronic filing system and were readily accessible during the audit.  Evidence: [3] Shamrock Station Irrigation Project CAR 2021 [4] Shamrock Station Irrigation Project CAR 2022
1086:M4.5	Compliance Reporting	The proponent shall advise the CEO of any potential non-compliance within seven (7) days of that non-compliance being known.	Provide written correspondence to CEO within 7 days of any potential non-compliance.	Correspondence to CEO advising of potential non-compliance. Annual CAR.	Overall	Ongoing	C	No non-compliances were identified or known by ACC during the reporting period.
1086:M4.6	Compliance Reporting	The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO. The Compliance Assessment Report shall: (1) be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf; (2) include a statement as to whether the proponent has complied with the conditions; (3) identify all potential non-compliances and describe corrective and preventative actions taken; (4) be made publicly available in accordance with the approved Compliance Assessment Plan;	Submit Annual CARs addressing all requirements annually to DWER.	Annual CAR. Transmittal documentation of CAR.	Overall	By 19 February 2020 and then annually on this date thereafter.	C	This 2023 Compliance Assessment Report (CAR) for the period 19 November 2022 to 18 November 2023 is ACC's third CAR for MS1086. This CAR: <ul style="list-style-type: none"> <li>Is endorsed by an authorised representative of ACC;</li> <li>Includes a statement of compliance;</li> <li>Identifies potential non-compliances and corrective and preventative actions (where applicable);</li> <li>Is appropriately stored on ACC's electronic filing system and is publicly available; and</li> <li>Includes a statement on proposed changes to the CAP.</li> </ul>



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		and (5) indicate any proposed changes to the Compliance Assessment Plan required by condition 4-1.						
1086:M5.1	Public Availability of Data	Subject to condition 5-2, within a reasonable time period approved by the CEO of the issue of this Statement and for the remainder of the life of the proposal the proponent shall make publicly available, in a manner approved by the CEO, all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps)) relevant to the assessment of this proposal and implementation of this Statement.	Make data relevant to the assessment of this proposal and implementation of this statement publicly available as per <i>Post Assessment Guidance for Making information publicly available</i> (OEPA 2012a).	Transmittal documentation of request for data. Website link (if posted on a website)	Overall	Ongoing	NR	Not Required at this Stage. The requirements of the audit element were not triggered during the reporting period. ACC has committed to make relevant data and information publicly available on request. No such requests were received during the reporting period.  Evidence [05] Shamrock Station Irrigation Project Compliance Assessment Plan Ministerial Statement :1086 (Prepared by Phoenix Environmental Sciences, dated 06/02/2019)
1086:M5.2	Public Availability of Data	If any data referred to in condition 5-1 contains particulars of: (1) a secret formula or process; or (2) confidential commercially sensitive information; the proponent may submit a request for approval from the CEO to not make these data publicly available. In making such a request the proponent shall provide the CEO with an explanation and reasons why the data should not be made publicly available.	Provide the CEO with an explanation and reasons why data should not be made publicly available.	Correspondence to the CEO of the OEPA requesting approval to not make data publicly available, if applicable.	Overall	Ongoing	NR	Not Required at this Stage. The requirements of the audit element were not triggered during the reporting period. ACC has committed to make relevant data and information publicly available on request. No such requests were received during the reporting period.  Evidence [05] Shamrock Station Irrigation Project Compliance Assessment Plan Ministerial Statement :1086 (Prepared by Phoenix Environmental Sciences, dated 06/02/2019)
1086:M6.1	Operational Environmental Management Plan	Prior to the commencement of ground-disturbing activities or as otherwise agreed in writing by the CEO, the proponent shall prepare and submit an Operational Environmental Management Plan to the CEO, to demonstrate that the following environmental objectives will be met:  (1) Avoid, where possible, and minimise impacts to the Greater Bilby within the development envelope as defined in Figure 2 of Schedule 1.  (2) Avoid, where possible, and minimise direct and indirect impacts so that the proposal does not cause long term impacts to the environmental values of the Injudinah Swamp and on the hydrological regime and water quality of the Broome Sandstone Aquifer.  (3) Avoid, where possible, and minimise direct and indirect impacts so that the proposal does not cause significant change in the location of the saltwater interface due to the abstraction of water for the proposal.  (4) Avoid, where possible, and minimise direct and indirect impacts so that the proposal does not cause long term impacts on Aboriginal heritage values.	Prepare an Operational EMP which is to be approved by the CEO.	Operational EMP. Approval notice from the CEO.	Pre-construction	Prior to the commencement of ground-disturbing activities or as otherwise agreed in writing by the CEO	CLD	The Shamrock Station Irrigation Project Operational Environmental Management Plan was approved by the CEO on the 7 <sup>th</sup> of April 2020. Non-substantial changes to the OEMP we made in April 2022.  Evidence [7] OEMP Approval letter DWER 07/04/2020 [8] Shamrock Station Irrigation Project Operational Environmental Management Plan (Prepared by Phoenix Environmental Sciences, dated 16/03/2020) [9] Shamrock Station Irrigation Project Operational Environmental Management Plan dated 28/04/2022 (ACC 2022)
1086:M6.2	Operational Environmental Management Plan	The Operational Environmental Management Plan shall:	Address all requirements in the Operational EMP.	Operational EMP. Approval	Overall	Ongoing	CLD	The OEMP specifies:

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<p>(1) specify the environmental objectives to be achieved, as specified in condition 6-1;</p> <p>(2) specify risk-based management actions that will be implemented to demonstrate compliance with the environmental objectives specified in condition 6-1. Failure to implement one or more of the management actions represents non-compliance with these conditions;</p> <p>(3) specify measurable management target(s) to determine the effectiveness of the risk-based management actions;</p> <p>(4) specify monitoring to measure the effectiveness of management actions against management targets, including but not limited to, parameters to be measured, baseline data, monitoring locations, and frequency and timing of monitoring;</p> <p>(5) specify a process for revision of management actions and changes to proposal activities, in the event that the management targets are not achieved. The process shall include an investigation to determine the cause of the management target(s) being exceeded;</p> <p>(6) provide the format and timing to demonstrate that condition 6-1 have been met for the reporting period in the Compliance Assessment Report required by condition 4-6 including, but not limited to:</p> <p>(a) verification of the implementation of management actions; and</p> <p>(b) reporting on the effectiveness of management actions against management target(s).</p>		notice from the CEO.				<ul style="list-style-type: none"> <li>Environmental objectives to be achieved, as specified in condition 6-1</li> <li>Risk-based management actions that will be implemented to demonstrate compliance with the environmental objectives specified in condition 6-1</li> <li>Measurable management target(s) to determine the effectiveness of the risk-based management actions</li> <li>Monitoring to measure the effectiveness of management actions against management targets, including but not limited to, parameters to be measured, baseline data, monitoring locations, and frequency and timing of monitoring</li> <li>A process for revision of management actions and changes to proposal activities, in the event that the management targets are not achieved</li> <li>The format and timing to demonstrate that condition 6-1 have been met for the reporting period in the Compliance Assessment Report required by condition 4-6 including, but not limited to: (a) verification of the implementation of management actions; and (b) reporting on the effectiveness of management actions against management target(s).</li> </ul> <p>Evidence</p> <p>[7] OEMP Approval letter DWER 07/04/2020</p> <p>[8] Shamrock Station Irrigation Project Operational Environmental Management Plan (Prepared by Phoenix Environmental Sciences, dated 16/03/2020)</p> <p>[9] Shamrock Station Irrigation Project Operational Environmental Management Plan dated 28/04/2022 (ACC 2022)</p>
1086:M6.3	Operational Environmental Management Plan	<p>After receiving notice in writing from the CEO that the Operational Environmental Management Plan satisfies the requirements of condition 6- 2 for condition 6-1, the proponent shall: (1) implement the provisions of the Operational Environmental Management Plan; and (2) continue to implement the Operational Environmental Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated the objectives specified in condition 6-1 have been met.</p>	Implement the approved Operational EMP.	Annual CAR.	Overall	Ongoing until the CEO has confirmed by notice in writing that the proponent has demonstrated the objectives specified in condition 6-1 have been met.	C	<p>Evidence of the implementation of the EMP was observed through the review of relevant documentation, a site inspection and interviews with key ACC staff carried out for the purposes of preparing this CAR. During the reporting period, the following environmental outcomes were achieved:</p> <ul style="list-style-type: none"> <li>Impacts on the Greater Bilby within the development envelope were avoided.</li> <li>Impacts on environmental values of the Injudinah Swamp and Broome Sandstone Aquifer were avoided.</li> <li>Significant change in the location of the saltwater interface were avoided.</li> <li>Impacts on Aboriginal heritage values were avoided.</li> </ul> <p>Refer to Appendix 2 for the assessment of OEMP implementation.</p>

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								Evidence [1] Shamrock Development Envelope KML file [10] Bilby pre-clearing survey reports by Nigel Jacket (April – December 2021) [11] Groundwater Abstraction records for 2023 (DWER Meter reading export_23_11_2023.xlsx) (indicating that abstraction was 0.76GL (8 % of the 9.5GL allocation) [12] Final Report for the Heritage Impact Potential for the Proposed Shamrock Station Irrigation Project. Prepared by CBG Solutions for Argyle Cattle Company.
1086:M6.4	Operational Environmental Management Plan	In the event that monitoring, tests, surveys or investigations indicate exceedance of management target(s) specified in the Operational Environmental Management Plan, the proponent shall: (1) report the exceedance in writing to the CEO within twenty-one (21) days of the exceedance being identified; (2) investigate to determine the cause of the management targets being exceeded; (3) provide a report to the CEO within ninety (90) days of the exceedance being reported as required by condition 6-4(1). The report shall include: (a) cause of management targets being exceeded; (b) the findings of the investigation required by condition 6-4(2); (c) details of revised and/or additional management actions to be implemented to prevent exceedance of the management target(s); and (d) relevant changes to proposal activities.	Notify the CEO within 21 days of any exceedance of management targets being identified. Investigate cause of any exceedance. Provide a written report to the CEO within 90 days of any exceedance being reported.	Written notification to the CEO. Investigation report.	Overall	Report exceedance within 21 days of the exceedance being identified to CEO, provide a report within 90 days to the CEO	NR	During the reporting period, the following environmental outcomes were achieved: <ul style="list-style-type: none"> <li>Impacts on the Greater Bilby within the development envelope were avoided.</li> <li>Impacts on environmental values of the Injudinah Swamp and Broome Sandstone Aquifer were avoided.</li> <li>Significant change in the location of the saltwater interface were avoided.</li> <li>Impacts on Aboriginal heritage values were avoided.</li> </ul> Refer to Appendix 2 for the assessment of OEMP implementation
1086:M6.5	Operational Environmental Management Plan	In the event that monitoring, tests, surveys or investigations indicate that one or more management actions specified in the Operational Environmental Management Plan have not been implemented, the proponent shall: (1) report the failure to implement management action/s in writing to the CEO within seven (7) days of identification; (2) investigate to determine the cause of the management action/s not being implemented; (3) investigate to provide information for the CEO to determine potential environmental harm or alteration of the environment that occurred due to the failure to implement management actions;	Notify the CEO within 7 days of any failure to implement management action/s identified by monitoring, tests, surveys or investigations. Investigate cause of management action/s not being implemented. Provide a written report to the CEO within 21 days on any failure to implement management action/s.	Written notification to the CEO. Investigation report.	Overall	Ongoing	C	During the 2023 compliance audit conducted for preparing this CAR, two potential non-compliances were noted, with respect to: <ul style="list-style-type: none"> <li>Fencing not installed around each of the established pivots; and</li> <li>Lack of weed monitoring at pivots under irrigation and pasture.</li> </ul> ACC informed the CEO in writing within 7 days of these potential non-compliances being noted.  Evidence [13] Letter ACC to DWER MS 1086: Advice of Non-Compliance dated 21/12/2023.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(4) provide a report to the CEO within twenty-one (21) days of the reporting required by condition 6-5(1). The report shall include: (a) cause for failure to implement management actions; (b) the findings of the investigation required by conditions 6-5(2) and (3); (c) relevant changes to proposal activities; and (d) measures to prevent, control or abate the environmental harm which may have occurred.						
1086:M6.6	Operational Environmental Management Plan	The proponent: (1) may review and revise the Operational Environmental Management Plan, or (2) shall review and revise the Operational Environmental Management Plan as and when directed by the CEO.	Review and revise the Operational EMP to the requirements of the CEO.	Revised Operational EMP. Approval notice from the CEO.	Overall	Ongoing	NR	The OEMP was not revised during the audit period.
1086:M6.7	Operational Environmental Management Plan	The proponent shall implement the latest revision of the Operational Environmental Management Plan, which the CEO has confirmed by notice in writing, satisfies the requirements of condition 6-2.	Implement the approved revisions of the Operational EMP.	Annual CAR.	Overall	Ongoing	C	The Shamrock Station Irrigation Project Operational Environmental Management Plan was approved by the CEO on the 7 <sup>th</sup> of April 2020. Non-substantial changes to the OEMP we made in April 2022.  Evidence [7] OEMP Approval letter DWER 07/04/2020 [8] Shamrock Station Irrigation Project Operational Environmental Management Plan (Prepared by Phoenix Environmental Sciences, dated 16/03/2020) [9] Shamrock Station Irrigation Project Operational Environmental Management Plan dated 28/04/2022 (ACC 2022)
1086:M7.1	Aboriginal Heritage	Prior to the commencement of ground-disturbing activities, the proponent shall consult with the Karajarri Native Title Claim group and ensure that the proponent complies with its obligations under the Aboriginal Heritage Act 1972.	Consult with the Karajarri Native Title Claim group and ensure compliance of the proposal with the Aboriginal Heritage Act 1972	Aboriginal heritage report. Annual CAR.	Pre-construction	Prior to the commencement of ground-disturbing activities	C	A review of disturbance to date, compared with the results of an archaeological survey of the Project Area indicates that ACC's obligations under the Aboriginal Heritage Act 1972 have been adhered to.  Evidence [1] Shamrock Development Envelope KML file [12] Final Report for the Heritage Impact Potential for the Proposed Shamrock Station Irrigation Project. Prepared by CBG Solutions for Argyle Cattle Company.

## **Appendix 2**

# **Operational Environmental Management Plan Audit Results**

**Appendix 2 Environmental Management Plan Audit Results**

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 (Appendix 2) 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 Appendix 2)</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>	C	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>	PNC	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>	PNC	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 was constrained to within the boundary of the irrigated area on the pivots.  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>	C	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 (S1PB01, S1PB02, S1PB03, S1PB05, S1PB06)



Audit Code	Subject / Management Action	Requirement	How	Evidence	Status	Further Information
						Evidence [1] Shamrock Development Envelope KML file [10] 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 (DBCA 2018b): <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>	C	<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 [10] 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>	NR	<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 [10] 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>	C	<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 monitoring_2022_v0 [19] Shamrock Station Irrigation Project Introduced Animal Monitoring October 2023 (Boyle, A. 2023)</p>

Audit Code	Subject / Management Action	Requirement	How	Evidence	Status	Further Information
HP1	<p>Inland Waters – Abstraction</p> <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>	C	<p>Water abstraction records indicate that abstraction during the audit 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.</p> <p>Evidence:                      [11] Groundwater Abstraction records for 2023 (DWER Meter reading export_23_11_2023.xlsx)                      [21] Shamrock Station 2023 Annual GWL Report</p>
HP2	<p>Inland Waters – Groundwater Dependent Ecosystems</p> <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>	C	<p>Water abstraction records indicate that abstraction during the audit 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.</p> <p>The 2023 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.</p> <p>It is noted that off-site monitoring bores 17MB003S&amp;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&amp;I and 17MB004. ACC’s abstraction during the 2023 reporting period was 0.76GL.</p> <p>Evidence:                      [11] Groundwater Abstraction records for 2023 (DWER Meter reading export_23_11_2023.xlsx)                      [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)</p>

Audit Code	Subject / Management Action	Requirement	How	Evidence	Status	Further Information
HP3	<p>Inland Waters – Groundwater Quality</p> <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>	<p>Annual comprehensive water quality analysis of pumped groundwater sampled from:</p> <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>	C	<p>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.</p> <p>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</p> <p>Evidence [20] Shamrock Station 2023 Annual GWL Report</p>
HP4	<p>Inland Waters – Groundwater Quality</p> <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>	<p>Monitoring of electrical conductivity</p> <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>	C	<p>The A2023 nnuual 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</p> <p>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.</p> <p>Evidence [20] Shamrock Station 2023 Annual GWL Report</p>

## **Appendix 3**

### **Evidence Reviewed**

## Evidence Reviewed

- [1] Shamrock Development Envelope KML file
- [2] Commencement date for Shamrock Irrigation Project
- [03] Shamrock Station Irrigation Project CAR 2022
- [04] Shamrock Station Irrigation Project CAR 2023
- [5] Shamrock Station Irrigation Project Compliance Assessment Plan Ministerial Statement :1086 (Phoenix Environmental Sciences, dated 06/02/2019)
- [6] Shamrock Station Irrigation Project CAR 2023 (this CAR)
- [7] OEMP Approval letter DWER 07/04/2020
- [8] Shamrock Station Irrigation Project Operational Environmental Management Plan (Prepared by Phoenix Environmental Sciences, dated 16/03/2020)
- [9] Shamrock Station Irrigation Project Operational Environmental Management Plan dated 28/04/2022 (ACC 2022)
- [10] Bilby pre-clearing survey reports by Nigel Jacket (April – December 2021)
- [11] Groundwater Abstraction records for 2023 (DWER Meter reading export\_23\_11\_2023.xlsx)
- [12] Final Report for the Heritage Impact Potential for the Proposed Shamrock Station Irrigation Project. Prepared by CBG Solutions for Argyle Cattle Company.
- [13] Letter ACC to DWER MS 1086: Advice of Non-Compliance dated 21/12/2023.
- [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] Annual Groundwater Report 2023 Shamrock Station GWL203109 (Prepared by Innovative Groundwater Solutions, 2024)
- [21] Letter DWER to ACC offsite groundwater monitoring (22/04/2022)

## **Appendix 4**

### **Plates**





**Plate 1 Pivot 2 under irrigation and pasture**



**Plate 2 Boundary of Pivot 2 indicating limitation of pasture growth within irrigated area**





**Plate 3 Boundary of Pivot 1 indicating limitation of pasture growth within irrigated area**



**Plate 4 Pivot 4 cleared in preparation for irrigation and pasture**





**Plate 5 Boundary of Pivot 4 following clearing**



**Plate 6 Cleared vegetation stockpiled at boundary of Pivot 4 following clearing**





**Plate 7 Diesel (left) and fertiliser (right) tanks at Pivot 2**



**Plate 8 Bulk fertiliser tanks located off-site in main yard**