



Annual Compliance Report 2025

Northern Pipeline
Interconnector Stage
2 (NPI2)

EPBC 2007/3686

Distribution list

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Seqwater Manager Environment	7/05/2025
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Date	Name	Position	Responsibility & Key Changes	Signature
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2/02/2025	Eddie Eugster	Principal Environment - Operations	Email approval (internal ref: D25/88147)	

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Glossary

Term	Definition
AHMP	Aquatic Habitat Monitoring Program
AHMP Report 2024	The <i>Northern Pipeline Interconnector Stage 2 Project: Aquatic Habitat Monitoring Program Operational Phase 2024 Survey (AHMP Report 2024)</i> prepared by frc environmental
Approval Holder	The person to whom the approval is granted
DCCEEW	Department of Climate Change, Energy, the Environment, and Water
Department	The Australian Government Department responsible for administration of the <i>Environmental Protection and Biodiversity Conservation Act 1999</i> (Cth)
DLGWV	Department of Local Government, Water and Volunteers
EIS	Environmental Impact Statement
EPBC Act	<i>Environmental Protection and Biodiversity Conservation Act 1999</i> (Cth)
LinkWater Projects	Southern Regional Water Pipeline Company Pty Ltd
mAHD	Elevation in metres relative to the Australian Height Datum, which sets mean sea level as zero elevation. Mean sea level was determined from observations recorded by 30 tide gauges around the coast of the Australian continent for the period 1966–1968
Minster	The Minister responsible for administration of the <i>Environmental Protection and Biodiversity Conservation Act 1999</i> (Cth)
ML	Megalitres
ML/d	Megalitres per day
MNES	Matters of National Environmental Significance
NNA	Northern Network Alliance
NPI2	Northern Pipeline Interconnector Stage 2
OEMP	Operational Environmental Management Plan
QGC	Queensland Coordinator General
Reporting period	15 February 2024 to 15 February 2025
RHMP	Riparian Habitat Monitoring Program
SEQ	South East Queensland
Seqwater	Queensland Bulk Water Supply Authority

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Executive Summary

This Annual Compliance Report marks the fifteenth Matters of National Environmental Significance (MNES) assessment for the Northern Pipeline Interconnector Stage 2 (NPI2), covering 15 February 2024 to 15 February 2025. This report addresses compliance with the conditions set under the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval 2007/3686.

With the NPI2 project transitioning from construction and commissioning to operational phases, several conditions have been closed out, while others remain active. During this reporting period (15 February 2024 to 15 February 2025), 12 conditions were active, with three remaining inactive (EPBC 13, 14, and 17).

Based on monitoring activities, Seqwater is not aware of any significant impacts on EPBC Act-listed species or MNES during this reporting period.

Seqwater remains compliant with the EPBC 2007/3686 Conditions as outlined in [Table 2](#).

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1. Introduction

The NPI2 project was classified as a controlled action under the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act), with approval granted on 12 February 2010 under EPBC 2007/3686. Initially, the Southern Regional Water Pipeline Company Pty Ltd (trading as LinkWater Projects) was the proponent for this controlled action. LinkWater Projects was established by the Queensland Government to design and implement bulk water pipelines and associated infrastructure in South East Queensland (SEQ). However, on 30/06/12, as part of the Queensland Government's water sector reform, LinkWater Projects ceased operations, transferring its functions to the Queensland Bulk Water Transport Authority (trading as LinkWater). LinkWater took over operational control of ongoing and future projects previously managed by LinkWater Projects. Upon completion of construction and commissioning activities in July 2012, the NPI2 project infrastructure was handed over to LinkWater for operation and maintenance.

Subsequently, on 01/01/13, as part of additional Queensland Government water sector reforms, the Queensland Bulk Water Supply Authority (trading as Seqwater) merged with LinkWater and the SEQ Water Grid Manager. Seqwater became the primary statutory authority responsible for ensuring a safe, secure, and reliable water supply across SEQ. As a result, Seqwater assumed ownership and operational responsibility for the NPI2. With the consolidation of functions and powers from LinkWater, Seqwater is now responsible for the NPI2 and all related statutory approvals.

1.1. Environmental Approvals

The NPI Stage 2 project was designated as a controlled action under the EPBC Act due to its potential to significantly affect Matters of National Environmental Significance (MNES) protected by the EPBC Act, including listed threatened species and communities (s 18 and 18(a)), and listed migratory species (s 20 and 20(a)). This controlled action was evaluated under the Bilateral Agreement, and Commonwealth approval was granted on 12 February 2010 (EPBC 2007/3686).

1.1.1. Environmental Management Plans – Operational Phase

Under the approval conditions, the NPI2 Operational Environmental Management Plan (OEMP) and the Aquatic Habitat Monitoring Program (AHMP) were implemented to minimise environmental impacts and to monitor aquatic features that provide habitat for specific listed threatened species during the operational phase.

1.1.2. Operational Environmental Management Plan

The OEMP is designed to support the operational phase of NPI2 and outlines the management measures that will be applied to minimise environmental impacts. The OEMP ensures that mechanisms are established for environmental controls to be properly implemented, routinely monitored, and audited to evaluate their effectiveness. An updated OEMP was submitted to DCCEEW on 15/05/2014 and approved on 12/08/14.

1.1.2.1. Riparian Habitat Monitoring Program

While the operation of the NPI2 was not expected to affect riparian habitats or species listed under the EPBC Act that use such habitats, Seqwater commissioned an operational Riparian Habitat Monitoring Program (RHMP) as outlined in OEMP Section 6.1. This program aimed to evaluate the current condition of the riparian habitat along the Mary River at the Coles Crossing offtake and to provide recommendations for future monitoring requirements.

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The development of the operational RHMP involved reviewing the construction phase RHMP to identify past commitments and requirements. Key components of this review included documenting and analysing previously collected data, establishing performance criteria, defining mitigation measure response levels, identifying appropriate mitigation measures, and outlining riparian monitoring requirements. Following an extensive review, it was determined that the operation of NPI2 would not affect the riparian habitats at sites where the Giant Barred Frog (*Mixophyes iteratus*) has been observed, with no impact on individual frogs. However, it was recommended to continue monitoring the Giant Barred Frog and its habitat annually for two years (November 2014 and November 2015).

An updated OEMP was submitted to DCCEEW on 15/05/14 and approved on 12/08/14, closing the RHMP after the two-year monitoring period as per OEMP Section 6.1.

1.1.2.2. Aquatic Habitat Monitoring Program

The AHMP was established to support the operational phase of NPI2, aiming to monitor aquatic features that serve as habitats for the Mary River cod (*Maccullochella peeli mariensis*), the Australian lungfish (*Neoceratodus forsteri*), and the Mary River turtle (*Elusor macrurus*) in both the Mary River and Six Mile Creek.

The development of the operational AHMP included a comprehensive review of the construction phase AHMP, which was finalised in the 2011-2012 reporting period to identify previous commitments and requirements, including:

- Conducting baseline ecological monitoring to establish performance indicators and response levels.
- Documenting and analysing baseline data.
- Establishing performance criteria and mitigation measure response levels.
- Identifying appropriate mitigation measures.
- Defining aquatic habitat monitoring requirements.

Based on the framework approved during the construction phase AHMP, the suggested ongoing monitoring program includes five of the nine sites examined in the baseline survey. Additionally, a simplified survey method was proposed compared to the initial approach. The recommended frequency of habitat monitoring is once annually, scheduled for October during low flow conditions. Annual assessments of aquatic habitat for the MNES species at the five designated sites provide data to evaluate the performance of this indicator in maintaining suitable aquatic habitat in the survey area. An overview of the *AHMP Report 2024* for this reporting period is provided in [Section 4](#), with the full report included in [Appendix A](#).

A maximum extraction rate of 20 ML/day from the Coles Crossing offtake has been conditioned as a performance indicator during the operational phase of the NPI2. An assessment of potential impacts on MNES species, conducted as part of the Environmental Impact Statement (EIS) for the NPI2 Project, indicated no significant change to the frequency or duration of flows predicted for seasonally high and low flow periods of the Mary River at extraction levels up to 40 ML/day. However, the existing infrastructure at the Coles Crossing pump station (referred to as the Coles Crossing offtake) is designed for a maximum extraction rate of only 20 ML/day, which is half of what was assessed in the EIS.

Should there be future plans to increase the water extraction rate beyond 20 ML/day through infrastructure upgrades, the AHMP will need to be revised accordingly, acknowledging that additional environmental approvals or an amendment to existing approvals may be required for such an upgrade.

The operational AHMP received approval from DCCEEW in August 2014.

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1.2. NPI2 Project Overview

The NPI2 is a critical component of the SEQ Water Grid, enabling the transmission of up to 65 Megalitres (ML) per day of treated drinking water between reservoirs in the Sunshine Coast and the Brisbane metropolitan area. This infrastructure plays a vital role in ensuring a reliable water supply for SEQ, thus contributing to the region's long-term water security.

As detailed in the NPI2 EIS¹, the project connects the Noosa Water Treatment Plant (WTP) with the northern end of the previously completed Stage 1 pipeline at Eudlo. The construction involved approximately 44 kilometres of mainline pipeline and 4.3 kilometres for the Noosa branch main. Designed for bi-directional flow, NPI Stages 1 and 2 facilitate the transfer of treated drinking water in both southern and northern directions between the North Pine WTP and Noosa WTP.

NPI2 was delivered by the Northern Network Alliance (NNA), comprising KBR, Abigroup, McConnell Dowell, and LinkWater Projects as the owner-participant. Upon completion of construction, ownership of NPI2 transferred to LinkWater on 30/06/2012, and subsequently to Seqwater following the merger involving LinkWater, the SEQ Water Grid Manager, and Seqwater on 1/01/2013.

The NPI2 project milestones completed to date include:

- Construction on the NPI2 project commenced on 15/02/10.
- Construction was completed on 17/11/11.
- Commissioning works were finalised, and the NPI2 was transferred to LinkWater in 2012.
- The operational phase of the NPI2 commenced on 08/07/12 and remains ongoing.

1.3. Purpose

Under EPBC 2007/3686 Condition 16, Seqwater must submit a compliance report to the Department within 3 months of each 12-month anniversary of the action's commencement. The report should demonstrate compliance with all conditions of this approval, including Conditions 24 to 32 of the Queensland Coordinator General's (QCG's) Report, over the previous 12 months. This Annual Compliance Report, covering the reporting period 15 February 2024 to 15 February 2025, is Seqwater's fifteenth MNES assessment for NPI2.

2. Compliance Designation

The compliance designation against each active Condition of the EPBC 2007/3686 Approval, dated 12/02/2010, for this reporting period is provided in **Table 2**. It includes the compliance designation along with a summary of supporting evidence. Additional compliance details are available in the following sections. A description of the compliance designation terminology used in **Table 2** is provided in **Table 1**. These descriptions have been extracted from the Commonwealth of Australia [Annual Compliance Report Guidelines 2023](#).

¹ Linkwater Projects, Northern Pipeline Interconnector – Stage 2 Environmental Impact Statement, December 2008

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Table 1. Compliance Designation Terminology used in Table 2

Compliance Designation Term	Description
Compliant	Achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
Non-compliant	Designated where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
Not Applicable	Designated where the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period.

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3. EPBC 2007/3686 Compliance Table

Table 2. EPBC 2007/3686 Conditions of Compliance Table

Condition Number	Condition	Compliance Designation	Evidence / Comments
1	The person taking the action must undertake the action in accordance with the conditions of this approval and, to the extent that it relates to protection of EPBC Act listed threatened species and communities and EPBC Act listed migratory species, as described in the EIS Documentation. Where the EIS Documentation and these conditions are contradictory, these conditions will prevail to the extent of the contradiction.	<input checked="" type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant <input type="checkbox"/> Not Applicable	Activities associated with the conditions of approval for EPBC 2007/3686 Condition 1 remain compliant for this reporting period.
2	Conditions 24, 25, 26, 27, 28, 29, 30, 31 and 32 of the QCG's Report are hereby incorporated into these conditions of approval. Subject to condition 3, the person taking the action must comply with conditions 24 to 32 of the QCG's Report.	<input checked="" type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant <input type="checkbox"/> Not Applicable	<p>QCG Conditions 24–27, 29–31 have been closed. QCG Conditions 28 and 32 remain active and are detailed below.</p> <p>Activities associated with the conditions of approval for EPBC 2007/3686 Condition 2 remain compliant for this reporting period.</p>
QCG 28	<p>LinkWater Projects is to develop a riparian monitoring program for the construction and operational phases of the project as detailed in the EIS.</p> <p>The monitoring program is to:</p> <ul style="list-style-type: none"> establish performance indicators within the EMPs against which environmental performance is measured/assessed; provide credible mechanisms (eg response levels) that trigger modification of mitigation measures or suspension of project-related activities (including altering the volume and timing of abstraction of water from the Mary River under existing allocations); assist in the continuous improvement of the project's environmental management; provide sufficient data for analyses and discussion - to be presented in regular reports; and provide additional information on local distribution, abundance and/or condition of protected species and important habitats and to inform species' databases kept by the Queensland Herbarium, the Queensland Museum and the DERM. 		<p>Construction phase: Closed during the 2011-12 reporting period.</p> <p>Operational phase: Closed post November 2015.</p> <p>Riparian Habitat Monitoring Program (RHMP): Submitted to DCCEEW on 15/05/14, approved on 12/08/14, and closed per Section 6.1.</p> <p>Operational Environmental Management Plan (OEMP): Remains active following its approval by DCCEEW on 12/08/14.</p>
QCG 32	<p>LinkWater Projects is to develop an aquatic habitat monitoring program for the construction and operational phases of the project as detailed in the EIS. The program is to monitor aquatic (instream) habitat features for the Mary River Turtle, Mary River Cod and the Australian Lungfish in the Mary River (downstream of the Coles Crossing offtake) and in Six Mile Creek.</p> <p>The monitoring program is to:</p> <ul style="list-style-type: none"> establish performance indicators within the EMPs against which environmental performance is measured/assessed; provide credible mechanisms (eg response levels) that trigger modification of mitigation measures or suspension of project-related activities (including altering the volume and timing of abstraction of water from the Mary River under existing allocations); assist in the continuous improvement of the project's environmental management; provide sufficient data for analyses and discussion- to be presented in regular reports; and 		<p>Aquatic Habitat Monitoring Program (AHMP): Remains active following its submission to DCCEEW on 15/05/14 and approval on 12/08/14.</p> <p>See Section 4 for an overview of the <i>AHMP Report 2024</i> and Appendix A for the full report.</p>

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	<ul style="list-style-type: none"> provide additional information on local distribution, abundance and/or condition of protected species and important habitats and to inform species' databases kept by the Queensland Herbarium, the Queensland Museum and the DERM. 		
3	<p>For the purpose of this approval, conditions 24, 25, 26, 27, 28, 29, 30, 31 and 32 of the QCG's Report (replicated in Annexure 1) are subject to the following requirements:</p> <ol style="list-style-type: none"> condition 24 must include EPBC Act listed threatened species and communities and listed migratory species; the final version of the SAPs imposed by condition 24 must be submitted to the Department prior to the Commencement of Construction at any place where there are likely to be impacts on EPBC Act listed threatened species and/or communities and/or listed migratory species; in relation to condition 26, the person taking the action must inform the Department at least 14 Business Days prior to the Commencement of the Action of the preferred crossing method (including providing reasons for the selection); the SAPs imposed by conditions 26 and 27 must be provided to the Department at least 14 Business Days prior to the Commencement of Construction of the waterway crossing(s). Construction of the waterway crossing(s) must not commence until the Minister has approved the SAP in writing; the SAPs referred to in condition 3.d. must be implemented; the minutes required by condition 27 must be provided to the Department at least 14 Business Days prior to the Commencement of Construction of the waterway crossing(s); details of the appropriate scheduling of the construction of waterway crossings referred to in Part B of condition 27 must be submitted to the Department at least 14 Business Days prior to the Commencement of Construction of the waterway crossing(s); the riparian monitoring program imposed by condition 28 must be submitted to the Department for the Minister's approval prior to the commencement of any Construction that may result in impacts on any riparian vegetation community on the site of the action. Construction that may result in impacts on any riparian vegetation community on the site of the action must not commence until the Minister has approved the riparian monitoring program in writing. The approved program must be implemented; the detailed surveys required by condition 31 must be submitted to the Department at least 14 Business Days prior to the commencement of any Construction at or in reasonable proximity of the proposed waterway crossings of Six Mile Creek; the aquatic habitat monitoring program imposed by condition 32 must be submitted to the Department for the Minister's approval prior to the commencement of any Construction that may result in impacts on any aquatic area on the site of the action. Construction that may result in impacts on any aquatic area on the site of the proposed action must not commence until the Minister has approved the aquatic habitat monitoring program in writing. The approved program must be implemented. 	<input checked="" type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant <input type="checkbox"/> Not Applicable	<p>Items 3(a) – (g) and (i): Closed during the 2011-12 reporting period.</p> <p>Items 3(h) and (j) remain ongoing for the operational phase.</p> <p>Item 3(h) has been addressed in line with RHMP Section 6.1 and the NPI2 OEMP, which received approval from DCCEW on 12/08/14.</p> <p>Activities associated with the conditions of approval for EPBC 2007/3686 Condition 3 remain compliant for this reporting period.</p>
4	<p>Within 3 months from the date of this approval the person taking the action must submit to the Minister for approval an</p>	<input checked="" type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant	<p>Items 4(a) and (b) were closed during the 2011-12 reporting</p>

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	<p>EMP. The EMP must include, but not be limited to, procedures for:</p> <ul style="list-style-type: none"> a. minimising impacts on all EPBC Act listed threatened species and communities and all EPBC Act listed migratory species on the pipeline route, including, but not limited to, all waterway crossings; b. post construction revegetation of disturbed areas to minimise ongoing erosion; c. the obtaining and keeping of accurate data that measures and records on both a daily and yearly basis the: <ul style="list-style-type: none"> i. amount of water extracted from Coles Crossing offtake; ii. flow volume and levels at both Coles Crossing pump station and Homepark gauging station; and iii. amount of water transported through the Northern Pipeline Interconnector Stage 2. 	<input type="checkbox"/> Not Applicable	<p>period. Item 4(c) remains ongoing for the operational phase.</p> <p>An updated OEMP was submitted to DCCCEW on 15/05/2014 and approved on 12/08/14.</p> <p>Seqwater maintains accurate records of the daily and yearly data as required under Item 4(c), with the exception that an alternative industry-standard instrument (bubbler), not specified in the OEMP, was used to supplement flow volume and water level data during this reporting period due to its completeness and reliability.</p> <p>Further information on Item 4(c) is provided in Section 3.1.</p>
5	The data obtained and kept by the person taking the action in accordance with condition 4.c. must be submitted to the Department within three months of every 12 month anniversary of the Commencement of the Action.	<input checked="" type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant <input type="checkbox"/> Not Applicable	This annual compliance report fulfills Condition 5, with all records maintained and summarised herein.
7	If the person taking the action wishes to carry out any activity otherwise than in accordance with these conditions, the person taking the action must immediately submit for the Minister's written approval a revised version of any such plan/program. If the Minister approves any such revised plan/program, that plan/program must be implemented in place of the plan/program originally approved.	<input checked="" type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant <input type="checkbox"/> Not Applicable	<p>No activities were conducted outside the specified conditions during this reporting period, and no written approval from the Minister was requested for any revised plans or programs before their implementation.</p> <p>Seqwater intends to seek approval to revise the OEMP requirements accordingly for future reports. Refer to Section 3.2 for more details.</p>
9	<p>Should water be required to be extracted from the Coles Crossing offtake pursuant to the action, the person taking the action must transport water strictly in order of the following preferences:</p> <ul style="list-style-type: none"> • 1st preference- (run of river) water harvested from the Mary River main channel at the Coles Crossing offtake when flow at the pump station is at or above 90 ML/day and flow at Homepark gauging station is at or above 20 ML/day; or otherwise • 2nd preference- (controlled release from Borumba Dam) taking high priority allocation releases made from existing allocations from Borumba Dam (at the Coles Crossing offtake) of no more than 20 ML/day up to a total of 6500 ML/annum, when flow at the pump station is below 90 ML/day and flow at Homepark gauging station is below 20 ML/day. 	<input checked="" type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant <input type="checkbox"/> Not Applicable	<p>1st preference (run of river) water harvesting from Coles Crossing offtake occurred on 179 days during this reporting period. Controlled releases from Borumba Dam to meet downstream demands were made on 104 days, but not under the specific trigger in Condition 9(b), as flows at Home Park remained above 20 ML/day. No 1st preference harvesting or 2nd preference releases occurred on 87 days.</p> <p>See Section 3.3 for further details.</p>
10	Subject to condition 9, the person taking the action must not transport more than 20 ML/day (or 6500 ML/annum) from Coles Crossing offtake for the southern transfer of water through the pipeline.	<input checked="" type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant <input type="checkbox"/> Not Applicable	<p>Seqwater consistently transported less than 20 ML/day and extracted a total of 1,577 ML of water from the Coles Crossing offtake, in compliance with the existing water extraction entitlement.</p> <p>See Section 3.4 for further details.</p>
11	The person taking the action must comply with all relevant state water licences, permits and authorities in relation to the construction and operation of the action. To the extent that any state water licence, permit and authority is, or becomes, inconsistent with these conditions, these conditions will prevail.	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant <input checked="" type="checkbox"/> Not Applicable	No state water licenses, permits, or authorities were issued for the operation of NPI2 during this reporting period.
12	Within three months of every 12 month anniversary of the Commencement of the Action, the person taking the action must submit to the Department a report addressing compliance	<input checked="" type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant	This Annual Compliance Report satisfies the requirement to submit a Compliance Report to the

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	with each of the relevant state water licences, permits and authorities in relation to the construction and operation of the action, as referred to in condition 11.	<input type="checkbox"/> Not Applicable	Department annually within 3 months of the 12/02/2010 anniversary date.
13	If the Minister believes that it is reasonably necessary or desirable for the better protection of listed threatened species and communities and/or listed migratory species to do so, the Minister may request that the person taking the action make specified revisions to the plans/programs referred to in these conditions and submit the revised plan/program for the Minister's approval. The person taking the action must comply with any such request. The revised approved plan/program must be implemented in place of the plan/program originally approved.	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant <input checked="" type="checkbox"/> Not Applicable	No Ministerial requests for specified revisions to the plans/programs aimed at enhancing the protection of listed threatened species, communities, or listed migratory species were received during this reporting period.
14	If at any time after 5 years from the date of this approval, the Minister notifies the person taking the action in writing that the Minister is not satisfied that there has been Substantial Commencement of the works, the action must not thereafter be commenced without the written agreement of the Minister.	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant <input checked="" type="checkbox"/> Not Applicable	No Ministerial written notifications were received during this reporting period.
15	The person taking the action must maintain accurate records substantiating all activities associated with or relevant to these conditions of approval, including, but not limited to, measures taken to implement the management plans required by this approval (including the EMP), and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media.	<input checked="" type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant <input type="checkbox"/> Not Applicable	Seqwater maintains accurate records as required by the active EPBC 2007/3686 conditions for NPI2 operations. Records of all activities during this reporting period are documented. Additional records beyond what is outlined in this report can be provided to the DCCEEW upon request.
16	Within three months of every 12 month anniversary of the Commencement of the Action, the person taking the action must submit to the Department a report addressing compliance (including demonstrating how compliance has been achieved) with each and every condition of this approval (including conditions 24 to 32 of the QCG's Report at "Annexure 1") over the previous 12 months. Annual reports must be provided until the Minister is satisfied that the proponent has complied with all conditions of the approval.	<input checked="" type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant <input type="checkbox"/> Not Applicable	This Annual Compliance Report satisfies the requirement to submit a Compliance Report to the Department annually within 3 months of the 12/02/2010 anniversary date.
17	Upon the direction of the Minister, the person taking the action must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister. The independent auditor must be approved by the Minister prior to the commencement of the audit. Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant <input checked="" type="checkbox"/> Not Applicable	No Ministerial requests for an independent audit were received during this reporting period.

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3.1. EPBC 2007/3686 Condition 4

Compliance Designation – Compliant

EPBC 2007/3686 Condition 4(c) remains active during the operational phase, while Conditions 4(a) and 4(b) concluded in the 2011-12 reporting period. Additional information supporting Seqwater's compliance with Condition 4(c) is provided in [Sections 3.1.1 – 3.1.3](#).

3.1.1. EPBC 2007/3686 Condition 4(c)i – Water Extracted from Coles Crossing Pump Station

Under EPBC 2007/3686 Condition 4, Seqwater must maintain accurate data that measures and records the daily and annual amount of water extracted from the Coles Crossing offtake.

During this reporting period, a total of 1,577 ML of water was extracted from the Coles Crossing offtake under Seqwater's existing water extraction entitlement. This volume accounts for approximately 24.3% of the annual 6,500 ML extraction entitlement. [Table 3](#) provides a detailed summary of the daily extraction volumes from the Coles Crossing offtake, presented in monthly volumes with an annual total, as well as the corresponding monthly percentage of the annual 6,500 ML extraction entitlement.

Daily extraction volumes can be provided to DCCEE upon request.

Table 3. Summary of Raw Water Extraction Volumes from Coles Crossing Offtake during 15/02/24–15/02/25

Month	Sum of Daily Extraction Volumes (ML)	Monthly Percentage of Annual Allocation (6500 ML/y)
February 2024	76	12%
March 2024	165	2.5%
April 2024	167	2.6%
May 2024	0	0%
June 2024	0	0%
July 2024	0	0%
August 2024	0	0%
September 2024	183	2.8%
October 2024	430	6.6%
November 2024	299	4.6%
December 2024	12	0.2%
January 2025	166	2.6%
February 2025	79	1.2%
ANNUAL TOTAL	1577	24.3%

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3.1.2. EPBC 2007/3686 Condition 4(c)ii – Flow Volumes and Levels at Coles Crossing Pump Station and Home Park Gauging Station

Under EPBC 2007/3686 Condition 4, Seqwater must maintain accurate data that measures and records the daily and annual flow volume and levels at both Coles Crossing pump station and Home Park gauging station.

3.1.2.1. Flow Volumes and Water Levels at Coles Crossing Pump Station

As stated in the OEMP, water levels at Coles Crossing are measured using an Acoustic Doppler (in-situ monitoring instrument). Following flood damage, Seqwater relocated the Doppler to a better position to improve data access and maintenance. The installation was completed in December 2022 and commissioned in January 2023.

Average daily flows for this reporting period at the Coles Crossing Offtake have been compiled in [Table 4](#), in monthly volumes and an annual total, and are graphically represented in [Figure 1](#).

Table 4. Average Flow Volumes at Coles Crossing Offtake during 15/02/24–15/02/25

Month	Average Daily Flows at Coles Crossing Offtake (Doppler) (ML/d)	Average Daily Flows at Coles Crossing Offtake (Bubbler) (ML/d)
February 2024	1682	3564
March 2024	2545	3382
April 2024	1676	2074
May 2024	405	379
June 2024	397	149
July 2024	397	99
August 2024	397	871
September 2024	397	66
October 2024	397	41
November 2024	491	307
December 2024	5667	5821
January 2025	1604	962
February 2025	215	227
ANNUAL TOTAL	1280	1343

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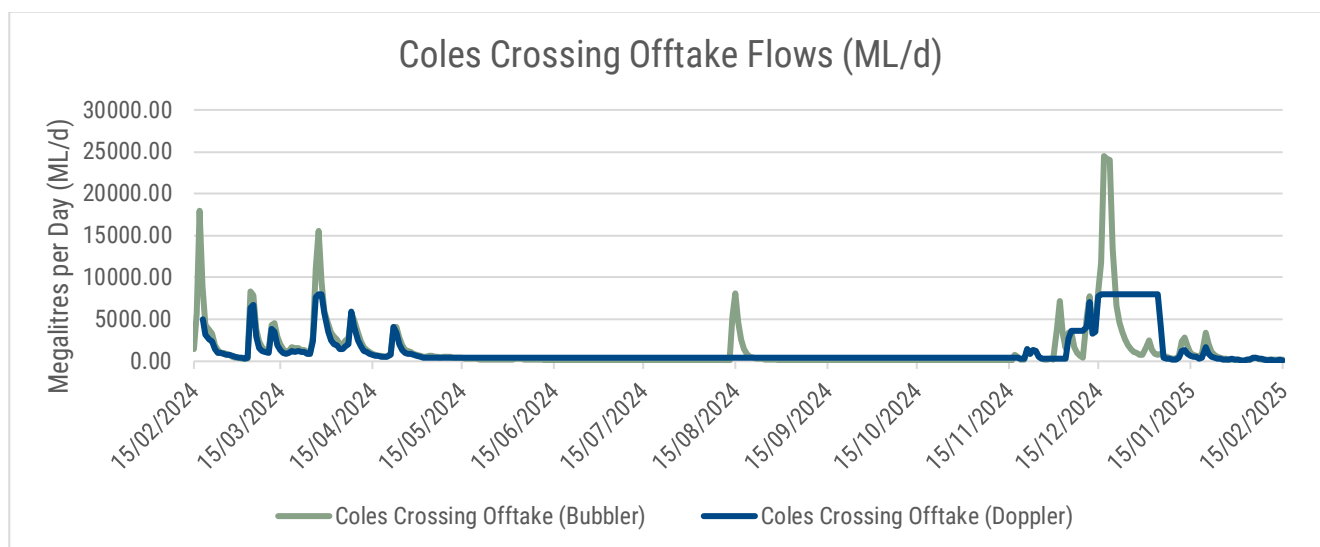


Figure 1. Average Flow Volumes at Coles Crossing Offtake during 15/02/24–15/02/25

Average daily water levels for this reporting period at the Coles Crossing Offtake have been compiled in [Table 5](#), in monthly values, and are graphically represented in [Figure 2](#).

Table 5. Average Water Levels at Coles Crossing Offtake during 15/02/24–15/02/25

Month	Average Daily Water Level at Coles Crossing Offtake (Doppler) (mAHD)	Average Daily Water Level at Coles Crossing Offtake (Bubbler) (mAHD)
February 2024	51.90	52.39
March 2024	52.32	52.33
April 2024	51.92	51.93
May 2024	51.26	51.26
June 2024	51.06	51.06
July 2024	51.00	51.00
August 2024	51.32	51.32
September 2024	50.94	50.94
October 2024	50.87	50.87
November 2024	51.11	51.11
December 2024	53.06	53.09
January 2025	51.52	51.52
February 2025	51.14	51.14

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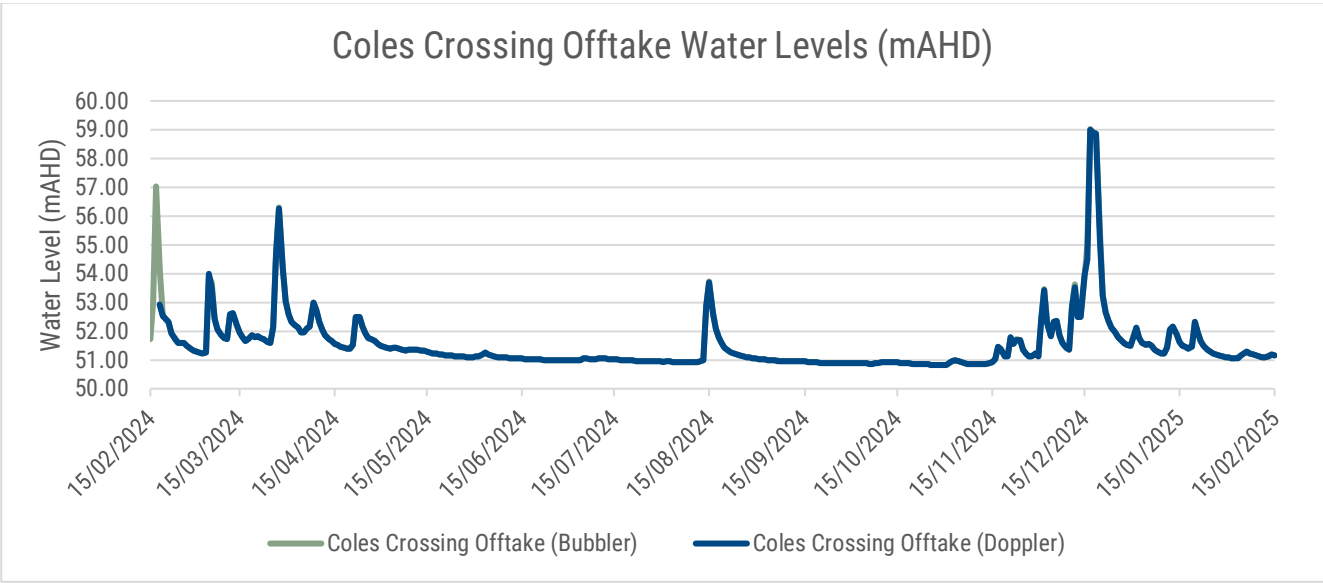


Figure 2. Average Water Levels at Coles Crossing Offtake during 15/02/24–15/02/25

It is noted that while there is a three-day data gap (15–17/02/24) in the Doppler flow volume and water level dataset recorded during this reporting period, discharge (bubbler) data, considered the industry-standard and preferred method, was used for reporting purposes. A complete set of bubbler data is available for this reporting period; therefore, there is no gap in the availability of flow volume and water level data as presented in [Tables 4](#) and [5](#). The apparent gap arises from the use of an alternative instrument not specified in the OEMP, rather than any deficiency in data availability or quality.

As noted in the previous Annual Compliance Report (15/02/23–15/02/24), although the Doppler has been successfully commissioned, it is not the preferred method for calculating volumes under low-flow conditions. This preference arises due to the wide and shallow stream profile with very low velocities and base flow, resulting in highly variable readings. Seqwater’s Hydrometric team recommended utilising bubbler data, which is generated using the industry-standard method incorporating survey data (e.g., cross-section, sensor levels, cease-to-flow points, slope, etc.), along with real-time flow gauging at various stages to establish a stage-to-discharge relationship specific to each site. Our data management system then uses this rating to convert the stage data into flow data. Flow gauging is consistently conducted at the site, and regular maintenance visits are undertaken to validate and calibrate the ratings as required. This method is employed across the majority of Seqwater’s Hydrographic sites and is widely utilised at Hydrographic stations throughout Australia. While the OEMP specifies the use of an Acoustic Doppler for flow monitoring, the industry-standard method is deemed more reliable. The data collected through this method is included in this report to meet the objectives of the monitoring program and fulfill the approval requirements.

Daily Coles Crossing Offtake flow volumes and water levels can be provided to DCCEEW upon request.

3.1.2.2. Flow Volumes and Water Levels at Home Park Gauging Station

Flow volumes (volumetric flow rate) and water levels at the Home Park gauging station (station number 138014A) are recorded daily by the Department of Local Government, Water and Volunteers (DLGWV). This data is available to the public on the DLGWV Water Monitoring Information Portal.

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Average daily flows and river levels for this reporting period at the Home Park gauging station have been compiled in [Table 6](#) in monthly volumes and an annual total, and are graphically represented in [Figure 3](#). Daily Home Park flow volumes and water levels can be provided to DCCEEW upon request.

Table 6. Average Flow Volumes and Water Levels at Home Park Gauging Station during 15/02/24–15/02/25

Month	Average Daily Flows at Home Park (ML/d)	Average River Level at Home Park (m)
February 2024	14205	3.34
March 2024	14231	3.33
April 2024	10353	3.06
May 2024	1630	2.02
June 2024	664	1.66
July 2024	419	1.54
August 2024	5955	2.25
September 2024	431	1.53
October 2024	468	1.53
November 2024	2563	2.03
December 2024	34290	4.62
January 2025	15890	3.47
February 2025	1768	2.09
ANNUAL TOTAL	7954	-

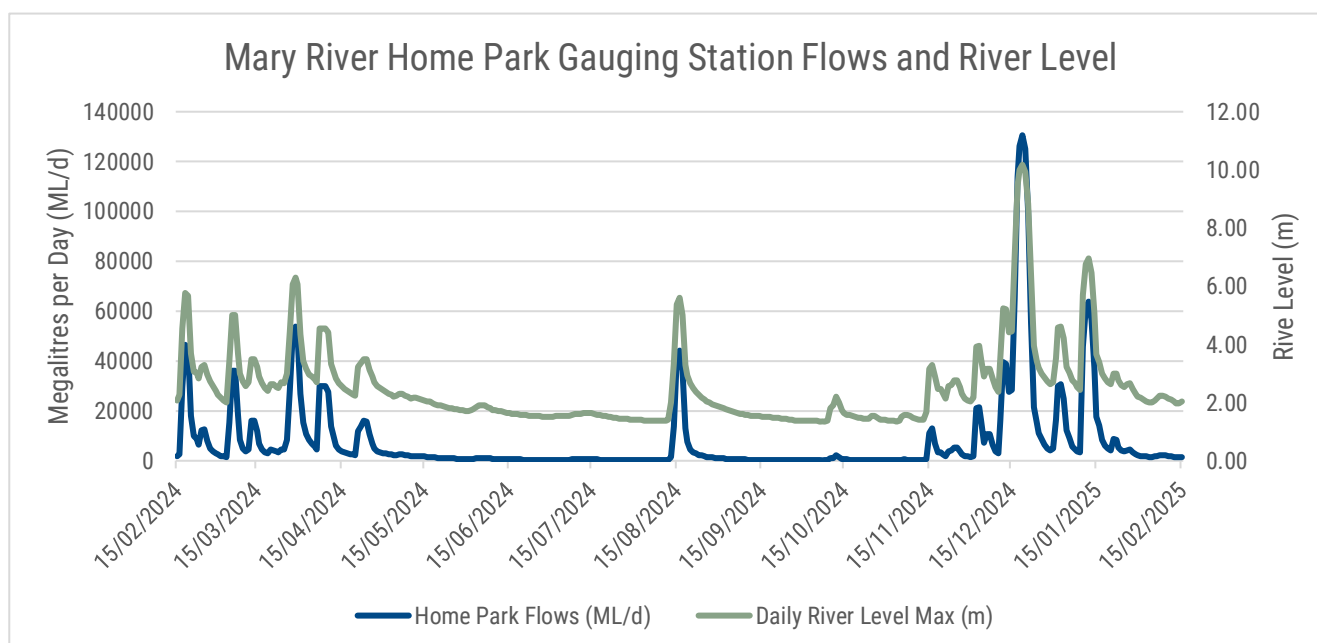


Figure 3. Average Flow Volumes and Water Levels at Home Park Gauging Station during 15/02/24–15/02/25

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3.1.3. EPBC 2007/3686 Condition 4(c)iii – Water Transported via NPI2

Under EPBC 2007/3686 Condition 4, Seqwater must maintain accurate data that measures and records the daily and annual amount of water transported through the NPI2.

Table 7 summarises the daily water transport data via the NPI2 for this reporting period in monthly volumes and an annual total. During this reporting period, Seqwater facilitated the transportation of approximately 554 ML of treated drinking water from Noosa WTP via the NPI2. Additionally, 3,073 ML of treated drinking water was supplied to the Noosa Zone via NPI2 from other grid-connected assets not associated with extraction from the Coles Crossing offtake. All records have been maintained and summarised in this report. Daily transfer volumes can be provided to DCCEEW upon request.

Table 7. Water Transport Volumes through NPI2 during 15/02/24–15/02/25

Month	Northern Flow "Import to Noosa Zone" (ML)	Southern Flow "Export from Noosa Zone" (ML)
February 2024	92	0
March 2024	178	7
April 2024	183	0
May 2024	463	0
June 2024	468	0
July 2024	487	0
August 2024	304	0
September 2024	156	105
October 2024	0	287
November 2024	54	155
December 2024	306	0
January 2025	277	0
February 2025	106	0
ANNUAL TOTAL	3073	554

3.2. EPBC 2007/3686 Condition 7

Compliance Designation – Compliant

Under EPBC 2007/3686 Condition 7, if Seqwater wishes to conduct activities that do not align with the EPBC 2007/3686 Conditions of Approval, a revised version of any relevant plans/programs must be submitted to the Minister for written approval. Once approved, the revised plans/programs will supersede the originally approved plans/programs and must be implemented.

No activities were conducted outside the specified conditions during this reporting period, and no written approval from the Minister was requested for any revised plans or programs before their implementation.

As stated in **Section 3.1.2.1**, an alternative industry-standard instrument (bubbler), not specified in the OEMP, was used to supplement flow volume and water level data during this reporting period due to its completeness and reliability. Since this approach is the preferred method for assessing operations to meet monitoring program

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objectives and approval requirements, Seqwater intends to seek approval to revise the OEMP requirements accordingly for future reports.

3.3. EPBC 2007/3686 Condition 9

Compliance Designation – Compliant

Under EPBC 2007/3686 Condition 9, the transport of water through the NPI2 must be conducted in the following order of preference:

- 1st preference - (run of river) water harvested from the Mary River main channel at the Coles Crossing offtake when flow at the pump station is at or above 90 ML/day and flow at Home Park gauging station is at or above 20 ML/day; or otherwise
- 2nd preference - (controlled release from Borumba Dam) taking high priority allocation releases made from existing allocations from Borumba Dam (at the Coles Crossing offtake) of no more than 20 ML/day up to a total of 6500 ML/annum, when flow at the pump station is below 90 ML/day and flow at Home Park gauging station is below 20 ML/day.

No 1st preference water harvesting or 2nd preference controlled releases from Borumba Dam were undertaken on 87 of the 367 days during this reporting period (22.9%).

3.3.1. EPBC 2007/3686 Condition 9(a) – 1st Preference Run of River

During this reporting period, 1st preference (run of river) water harvesting from the Mary River Coles Crossing offtake occurred on 179 days.

On 141 of these days (78.8%), flows at Coles Crossing were at or above 90 ML/d, and flows at the Home Park gauging station remained above 20ML/d throughout the entire reporting period. Controlled releases from Borumba Dam supported flows on 3 of these 141 days (2.1%).

On the remaining 38 run of river days (21.1%), flows at Coles Crossing were below 90 ML/d. Controlled releases from Borumba Dam supported flows on 35 of these 38 days (92.1%).

Controlled releases from Borumba Dam were made to support operational requirements, including supply to Noosa WTP, high-priority users such as Gympie Regional Council and irrigation customers, and to maintain downstream water levels.

Daily 1st preference water harvesting volumes can be provided to DCCEEW upon request.

3.3.2. EPBC 2007/3686 Condition 9(b) – 2nd Preference Controlled Release from Borumba Dam

During this reporting period, releases from existing Borumba Dam allocations were made on 104 days to meet downstream demands. These releases were not made under the specific trigger outlined in Condition 9(b), as flows at the Home Park gauging station remained above 20ML/d for the entire reporting period.

On 10 of the 104 release days (9.6%), flows at Coles Crossing offtake were above 90 ML/d. On the remaining 94 days (90.4%), Coles Crossing flows were below 90 ML/d.

Although the Coles Crossing threshold (<90 ML/d) was met on most release days, the flow conditions at Home Park (<20 ML/d), which, together with Coles Crossing, would indicate the need to apply 2nd preference, did not occur at any time during this reporting period. This reflects natural flow conditions rather than any deviation from compliance.

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As such, the releases made during this reporting period supported operational requirements, including supply to Noosa WTP, high-priority users such as Gympie Regional Council and irrigation customers, and to maintain downstream water levels.

The total volume of controlled releases from Borumba Dam during this reporting period was approximately 954 ML. **Table 8** provides a monthly summary of the controlled releases from Borumba Dam. Daily 2nd preference water harvesting volumes can be provided to DCCEE upon request.

Table 8. Borumba Dam Controlled Releases during 15/02/24–15/02/25

Month	Controlled Releases from Borumba Dam (ML)
February 2024	0
March 2024	0
April 2024	0
May 2024	0
June 2024	0
July 2024	108
August 2024	118
September 2024	289
October 2024	253
November 2024	186
December 2024	0
January 2025	0
February 2025	0
TOTAL	954

3.4. EPBC 2007/3686 Condition 10

Compliance Designation – Compliant

Under EPBC 2007/3686 Condition 10, and subject to Condition 9, Seqwater must not transport over 20 ML/day or 6500 ML/year from Coles Crossing offtake for the southern transfer of water through NPI2.

During this reporting period, Seqwater consistently transported less than 20 ML/d and extracted a total of 1,577 ML of water from the Coles Crossing offtake, in accordance with the existing water extraction entitlement. This volume represents approximately 24.3% of the 6,500 ML annual extraction entitlement. **Table 3** provides the monthly extraction volumes.

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4. Aquatic Habitat Monitoring Program Overview

Per QCG Condition 32, Seqwater engaged a qualified consultant to conduct the annual AHMP survey in October 2024 across five sites (three on the Mary River and two on Six Mile Creek) during NPI2 operations. The *Northern Pipeline Interconnector Stage 2 Project: Aquatic Habitat Monitoring Program Operational Phase 2024 Survey (AHMP Report 2024)* prepared by frc environmental, presents the results of the eleventh AHMP survey and compares them with the baseline survey from October 2013 and subsequent annual surveys from 2014-2023. This comparison assesses any changes to the aquatic habitat of species identified as MNES and whether any observed changes result from NPI2 operations. The full *AHMP Report 2024* is available in [Appendix A](#), with a summary of the key findings provided below:

- Suitable or potentially suitable habitat for MNES species, including Mary River Cod, Australian Lungfish, White-Throated Snapping Turtle, and Mary River Turtle, were identified at all sites on the Mary River in October 2024.
- One deceased Australian Lungfish was observed at monitoring site MR4, 27km downstream of Seqwater’s infrastructure. The cause of death remains unknown.
- Unidentified turtles were observed swimming or basking on logs before entering the water at various sites in the Mary River.
- Although Six Mile Creek has sporadically hosted Australian Lungfish, it is not considered their preferred habitat, suggesting a low likelihood of a significant population.
- Habitat conditions in Six Mile Creek are favourable for Mary River Turtle and White-Throated Snapping Turtle; however, no sightings of these species were recorded, suggesting their occurrence in low abundance.
- The predominantly shallow pools in Six Mile Creek suggest limited availability of deeper habitats favoured by adult Mary River Cod, although these pools are likely to support juvenile and intermediate-sized Mary River Cod.
- With recent increases in flow events, habitat suitability may be enhanced should the trend continue. This observation may be supported by the station’s water level data over the 12 months preceding the 2024 survey, which indicated an increased average depth (1.82m) compared to the 12 months leading up to the 2023 survey (averaging approximately 0.5 – 1.0m).
- Comparing the current conditions to those observed during the October 2023 survey, the overall habitat suitability for MNES species in the Mary River and Six Mile Creek has remained relatively stable.

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5. Conclusion

During this reporting period, the NPI2 pipeline and associated facilities remained operational, with no activities undertaken by Seqwater that could significantly impact EPBC Act-listed species or MNES.

An alternative industry-standard instrument (bubbler), not specified in the OEMP, was used to supplement flow volume and water level data during this reporting period due to its completeness and reliability. Since this approach is the preferred method for assessing operations to meet monitoring program objectives and approval requirements, Seqwater intends to seek approval to revise the OEMP requirements accordingly for future reports.

Per QCG Condition 32, the annual AHMP survey was conducted in October 2024. Focusing on in-stream aquatic features crucial for the habitat of EPBC Act listed species such as the Mary River Cod, Australian Lungfish, Mary River Turtle, and White-Throated Snapping Turtle in the Mary River and Six Mile Creek, the 2024 survey marks the eleventh undertaken during the operational phase of the NPI2. Results indicate that the overall habitat suitability for MNES species in these areas has remained relatively stable compared to the previous 2023 survey. The full *AHMP Report 2024* is available in [Appendix A](#).

Throughout this reporting period, Seqwater is not aware of any events with the potential to significantly impact EPBC Act listed species or MNES, and no incidents necessitating notification to DCCEEW occurred.

Seqwater remains compliant with EPBC 2007/3686 Conditions as outlined in [Table 2](#) and is committed to continuous improvement and the prevention and mitigation of potential impacts to environmental values within and surrounding its facilities and assets.

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Appendix A – AHMP Report 2024

Refer to the below *Northern Pipeline Interconnector Stage 2 Project: Aquatic Habitat Monitoring Program Operational Phase 2024 Survey (AHMP Report 2024)* prepared by frc environmental.

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