



INDEPENDENT AUDIT REPORT

EPBC Approval 2017/8078



LAKE MACDONALD (SIX MILE CREEK) DAM IMPROVEMENT PROJECT

Six Mile Creek Dam Safety Upgrade

Audit period: 6 November 2024 to 31 May 2026



Document Control

Version	Date	Author	Status	Details
0	20/07/2026	Corey Brond	DRAFT	Draft issued to the approval holder for factual review
1	13/08/2026	Corey Brond	DRAFT	Post audit information supplied and the report updated
2	20/08/2026	Corey Brond	DRAFT	Final report issued to the approval holder. Submitted the DCCEEW for review.
3	21/09/2026	Corey Brond	FINAL	Revised in response to DCCEEW feedback. Conditions 5.a.ii, 5.e.iv, 14 and 28 each assigned a Compliant determination, consistent with the Section 6.5 definition. Observation is not used as, or alongside, a rating against an individual condition element. Summary tables and narrative updated accordingly. Condition 22 corrected from Compliant to Non-Compliant on internal review. The evidence and determination for Condition 22.1 (see Section 7) are now consistent with Condition 21. The 28–31 January 2026 DS01 dissolved-oxygen incident was not notified within 2 business days (Condition 21) and full details were not subsequently provided within 10 business days (Condition 22). Summary tables (Sections 1.3 and 8), the corrective action register (Section 10) and the Executive Summary and Conclusion narrative updated accordingly to reflect four non-compliances.

Prepared by Corey Brond, EWA Environmental Pty Ltd, the DCCEEW-approved independent auditor for this action. This report is based on the audit criteria and methodology approved by DCCEEW (EWA0050.1, Rev 1), attached at Appendix A.



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Abbreviations and Definitions

Term	Definition
AFSRMP	Aquatic Fauna Salvage and Relocation Management Plan
AMP	Adaptive Management Plan (approved instrument: Rev 15, August 2025)
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DAF	Department of Agriculture and Fisheries (Queensland)
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
MNES	Matters of National Environmental Significance
NCR	Non-Conformance / Non-Compliance Report
RAMP	Revised Adaptive Management Plan
Seqwater	Queensland Bulk Water Supply Authority (approval holder), ABN 75 450 239 876
SQP	Suitably Qualified Professional (as defined in the approval)

1. Executive Summary

This report presents the findings of the first independent audit of the Six Mile Creek Dam Safety Upgrade (Lake Macdonald (Six Mile Creek) Dam Improvement Project), conducted under Condition 23 of EPBC Approval 2017/8078. The audit was commissioned by John Holland Group on behalf of Seqwater and undertaken by Corey Brond of EWA Environmental Pty Ltd, whose nomination as independent auditor was approved by DCCEEW on 30 March 2026.

1.1. Re-Cast Audit Period

The audit criteria and methodology (EWA0050.1) originally defined the audit period as 1 June 2025 to 31 May 2026, on the basis of an assumed commencement of the action on 26 May 2025. Assessment of the commencement date formed part of the approved audit scope. That assessment established, on the contemporaneous notification record, that commencement of the action occurred on 6 November 2024 (mobilisation of plant to site during early works), within the five-year approval window. The commencement record is internally inconsistent (see Section 7); the earliest record, made closest to the event, has been adopted.

The consequence is that the first 12-month period under Condition 23 ran from 6 November 2024 to 5 November 2025, and no independent audit was conducted for that period. Rather than audit that period alone and leave a gap in coverage, this audit has been conducted as a one-off catch-up audit spanning 6 November 2024 to 31 May 2026, capturing the whole of the missed first period while retaining the end date specified in the approved audit criteria. The rationale and the proposed realignment of future audit cycles are set out at Section 4.3.

1.2. Overall Audit Opinion

This audit was conducted in accordance with the *Independent Audit and Audit Report Guidelines (2019)* and the audit criteria approved by DCCEEW on 29 May 2026, subject to the re-casting of the audit period described above. All 63 condition elements were assessed.

In the auditor's opinion, the approval holder has substantially complied with the conditions of EPBC Approval 2017/8078 during the audit period, with the exception of four non-compliances. The first two concern the timing of the annual compliance reporting cycle (Condition 20.a) and the independent audit cycle (Condition 23), both arise from a single administrative error, the adoption of 26 May 2025 rather than 6 November 2024 as the commencement of the action, which the approval holder identified independently and self-reported to the Department on 3 July 2026. The third and fourth both concern a reportable water-quality incident at DS01 (28–31 January 2026), a failure to notify it to the Department within the 2-business-day timeframe required by Condition 21, and a failure to provide full details of it within the 10-business-day timeframe required by Condition 22. No impact to a Matter of National Environmental Significance was identified. No non-compliance was identified against any condition specific to the action.

1.3. Summary of findings

Compliance findings against the audit criteria are summarised below. All condition elements addressed by the audit criteria were assessed; no element was left outstanding.

Rating	Code	Count	Notes
Compliant	Y	39	
Non-Compliant	N	4	Conditions 20.a (reporting-cycle) and 23 (audit-cycle) misalignment, and Conditions 21 and 22 (a reportable water-quality incident notified to DCCEE within neither the 2-business-day nor the 10-business-day timeframe).
Not Applicable	NA	20	Register at Appendix B
Total condition elements		63	

1.4. Key Findings

- Commencement (Condition 15): on the notification made at the time (6 November 2024, mobilisation of plant to site), commencement occurred within the five-year window and Condition 15 is assessed as Compliant. This depends on adopting the earliest commencement record (6 November 2024) over the later 26 May 2025 notification.
- Notification integrity (Condition 14): the original commencement notification (letter dated 7 November 2024, notifying the 6 November 2024 commencement) was timely, but the commencement record is internally inconsistent. Seqwater subsequently issued a second, conflicting notification (30 May 2025, citing 26 May 2025), and the Condition 21 self-report (3 July 2026) cited a further date of 13 November 2024, with the project operating on the incorrect 26 May 2025 basis. Condition 14 itself is assessed as Compliant. This process deficiency has been self-reported to DCCEE under Condition 21 (3 July 2026), and the resulting cycle misalignment is separately assessed as Non-Compliant against Conditions 20.a and 23.
- Audit and reporting cycles (Conditions 20 and 23): the annual reporting and audit cycles were structured to the later (26 May 2025) date and require realignment to the 6 November 2024 commencement. Condition 20.a and Condition 23 are assessed Non-Compliant, and the annual compliance report for the audit period has not been published. Condition 24 (auditor and criteria approval process) is Compliant.
- Incident notification (Conditions 21 and 22): a high-risk dissolved-oxygen exceedance at DS01 (28–31 January 2026), recorded by the approval holder as an incident under its own Trigger Action Response Plan, was not notified to DCCEE within the 2-business-day timeframe required by Condition 21, and full details of the event, including corrective action, potential impacts, and remedial timing, were not subsequently provided within the 10-business-day timeframe required by Condition 22. No impact to a Matter of National Environmental Significance was identified, both non-compliances are procedural.
- Plan revision notification (Condition 28): Revision 15 of the Adaptive Management Plan was provided to DCCEE on 1 August 2025 and implemented on 14 August 2025, an interval

materially shorter than the 20 business days' notice the condition requires. DCCEE's email of 14 August 2025 confirmed the submission adequately addressed Conditions 27 and 28, treated as the Department's acceptance of the notice given. The equivalent requirement was correctly applied in full to Revision 16.

- Water quality (Conditions 2.b, 5): monitoring is being implemented against AMP trigger values and high-risk exceedances are recorded (turbidity and pH upstream, dissolved oxygen downstream at DS01). An adaptive-management response is evidenced across two consecutive quarterly reports (pulsed siphon discharges and fresh flushes), and the September 2025 DS01 deviation was resolved as a probe malfunction, and the diagnostic BOD testing is in progress (round 2 due August 2026).
- Salvage and relocation (Conditions 9, 10): structured salvage and relocation operations were completed under permit, with only permitted species relocated and no relocation to prohibited catchments. No mortality or injury of a protected matter was recorded. The permanent relocation approach adopted for the Mary River Cod was assessed compliant, being permitted under Condition 10(d) and included within the DAF/DCCEE-reviewed AMP.
- Publication and records (Conditions 18, 19, 20): approved plans are published and remain accessible, but publication dates could not be verified from the website, no assessment against the Sensitive Ecological Data Policy was evidenced, and no records were sighted of spatial data being prepared in accordance with the Biological Survey and Mapped Data Guidelines (2018).

2. Auditor Details and Declaration of Independence

Independent auditor	Corey Brond
Audit firm	EWA Environmental Pty Ltd
DCCEEW approval of nomination	Signed and provided to DCCEEW on 27 March 2026, in the form prescribed by the Independent Audit and Audit Report Guidelines (2019). Copy at Appendix E.
Qualifications	Master of Environmental Science and Management, University of New England; Bachelor of Environmental Science, Charles Sturt University.
Professional certifications	Exemplar Global Lead Auditor - Environmental Management Systems: Environmental Management Audit and ISO 14001:2015 EMS Audit; Certified Professional Soil Scientist, Soil Science Australia; Infrastructure Sustainability Accredited Professional, Infrastructure Sustainability Council.

2.1. Declaration of Independence

A signed Declaration of Independence was provided to the Department on 27 March 2026 as part of the auditor nomination process under Condition 24(a), in the form prescribed by the Independent Audit and Audit Report Guidelines (2019). The auditor's nomination was subsequently approved by DCCEEW on 30 March 2026. A copy of the signed declaration, together with the auditor's curriculum vitae and evidence of qualifications, is provided at Appendix E.

The auditor confirms that the matters declared remained true throughout the conduct of this audit and as at the date of this report. Specifically, the auditor: has no financial interest in the approved action or in the approval holder; has not been involved in the preparation of the Adaptive Management Plan or any associated management plan, or in the design, delivery or supervision of the works or monitoring subject to this audit; has provided no consulting or advisory services to the approval holder or its contractor in relation to this project; and has no other interest or relationship that could reasonably be perceived to compromise the objectivity of the audit.

In making this declaration the auditor is aware that section 491 of the Environment Protection and Biodiversity Conservation Act 1999 makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to a person performing a duty or function under the Act.

3. Introduction and Background

3.1. The Action

Lake Macdonald (Six Mile Creek) Dam is located on Six Mile Creek approximately 10 km from Cooroy in the Noosa hinterland. Constructed in the early 1960s and raised in 1979, the dam impounds 8,018 ML at full supply level (RL 95.3 m AHD), with a surface area of 260 ha and a catchment area of 49 km². It is one of two principal raw water sources supplying potable water to Noosa Shire, and also supports recreational use including rowing, paddling and fishing.

The dam was designed to the safety standards of its time. Advances in dam engineering, in the estimation of extreme rainfall and flood events, and in the understanding of seismic risk have since established that the dam does not meet current Queensland dam safety regulatory requirements. The approved action is the upgrade of the dam to meet those standards, undertaken as part of Seqwater's Dam Improvement Program, with John Holland Group engaged as the principal construction contractor.

The works comprise the removal of the existing spillway and earth embankments and their replacement on weathered rock foundations. The new structure is a split-level concrete spillway, with a primary lower ogee crest set at the original lake level and an upper labyrinth spillway to pass larger flood events, together with reconstructed earth embankments on either side, ground improvement beneath the new embankments, scour protection downstream, and a new outlet works structure enabling emergency releases and environmental flows to Six Mile Creek. A temporary upstream cofferdam, approximately 300 m long and 10 m wide, is constructed to isolate the works area and is removed on completion. On completion the dam will retain the same full supply level and storage volume as the existing structure.

To enable construction, the water level in Lake Macdonald is lowered from RL 95.3 m AHD to RL 93.0 m AHD, approximately 42% of full supply volume, and subsequently maintained at RL 92.8 m AHD (approximately 39% of full supply) by the cofferdam for the duration of construction, a period of approximately 48 months. The lake remains a live storage subject to consumptive extraction throughout. Lowering is achieved using a siphon system, with a practical release limit of approximately 5 m³/s against a bankfull rate for Six Mile Creek of 10 m³/s. The initial lowering was undertaken over a period of not less than four weeks and was completed in July 2025.

Because the lowering reduces available aquatic habitat, the action includes an aquatic fauna salvage and relocation program undertaken by specialist fish ecologists under a Queensland General Fisheries Permit. Fauna are captured by electrofishing, fyke netting and seine netting, held in aerated holding facilities, and transported by purpose-built vehicles to relocation sites assessed for suitability and carrying capacity. Non-protected fish are relocated to Cooloolabin Dam, with sites in the Mary River and Yabba Creek identified for protected species.

It is the lowering of Lake Macdonald, and the associated construction and salvage and relocation activities, that give rise to the potential impacts on Matters of National Environmental Significance regulated under EPBC Approval 2017/8078. The construction program comprises four phases: construction of the temporary cofferdam (2025); demolition of the existing dam wall (2025–2026); construction of the new dam wall and infrastructure (2026–2028); and removal of the cofferdam and site rehabilitation (2028–2029), with completion anticipated in approximately late 2029, subject to weather and conditions. At the date of this audit, the temporary cofferdam had been completed, and

demolition of the existing spillway had commenced. Separately, and as an offset requirement imposed under the Queensland Coordinator-General's conditions, Seqwater is to construct a fishway at Gympie Weir on the Mary River.

3.2. Approval History

Approval	EPBC Approval 2017/8078
Date of approval	7 November 2019
Variation	Varied 10 August 2020 (Conditions 3 and 7 and the definition of "Independent expert")
Approval expiry	30 June 2035
Approval holder	Queensland Bulk Water Supply Authority (Seqwater), ABN 75 450 239 876
Approved management plan	Adaptive Management Plan (AMP) Rev 15, August 2025 (SMEC Australia for Seqwater), incorporating the AFSRMP

3.3. Protected matters

The following MNES species are protected under the controlling provisions of the approval and are subject to this audit:

- Mary River Cod (*Maccullochella mariensis*) - listed threatened species
- Australian Lungfish (*Neoceratodus forsteri*) - listed threatened species
- Mary River Turtle (*Elusor macrurus*) - listed threatened species
- White-throated Snapping Turtle (*Elseya albagula*) - listed threatened species
- Giant Barred Frog (*Mixophyes iteratus*) - listed threatened species

4. Scope, Objectives and Criteria

4.1. Objectives

The objective of this audit is to independently assess whether the approved action has been implemented in compliance with the conditions of EPBC Approval 2017/8078 (including the 10 August 2020 variation), the approved AMP (Rev 15), and all commitments relating to MNES. The audit also assesses the effectiveness of management measures in achieving intended environmental outcomes.

4.2. Audit criteria

The audit criteria are the original EPBC approval conditions (7 November 2019), the Variation of Conditions (10 August 2020), and the approved AMP Rev 15, as set out in the approved Audit Criteria and Methodology (EWA0050.1, Rev 1) attached at Appendix A. Compliance findings are rated using the following categories:

Rating	Code	Definition
Compliant	Y	Requirement fully met.
Non-Compliant	N	Requirement not met or only partially met.
Observation	O	Observations are reserved for matters relevant to a protected matter that are not strictly tied to compliance with a specific condition. An Observation is not to be used as, or alongside, a rating against an individual condition element. Every condition element must be assessed and reported as Compliant, Non-Compliant or Not Applicable only.
Not Applicable	NA	Requirement not triggered or not within the scope of the audit period.

4.3. Audit Period - Re-Cast

The approved Audit Criteria and Methodology defined the audit period as 1 June 2025 to 31 May 2026, framed on an assumed commencement of the action on 26 May 2025. Assessment of the commencement date, including the applicability of Conditions 14 and 15, was expressly within the scope of this audit.

During the audit, the commencement date was found to be inconsistently recorded across the approval holder's notifications. The earliest, contemporaneous record (notification D24/283386, 7 November 2024) states that early works commenced on 6 November 2024 with mobilisation of plant to site. The auditor has adopted that date as the commencement of the action (see Section 7).

The consequence is that the first 12-month period under Condition 23 ran from 6 November 2024 to 5 November 2025, and no independent audit was conducted for that period. Rather than audit that period alone and leave a gap in coverage, this audit has been conducted as a one-off catch-up audit spanning 6 November 2024 to 31 May 2026.

This audit has been recast to November 2024 to 31 May 2026. This approach was adopted as it captures the whole of the missed first 12-month period. It also retains the end date specified in the DCCEEW-approved audit criteria, so no period is left unaudited between the missed cycle and the approved scope. Finally, it also allows the compliance position across the intervening period to be assessed in a single exercise, rather than deferring matters arising after November 2025 to a later audit.

The auditor acknowledges that this period exceeds the 12 months contemplated by Condition 23. It is adopted as a non-recurring measure to remedy the missed cycle and establish a clean basis for future audits. The approval holder should confirm this approach with DCCEEW as part of resolving the Condition 21 self-report, and realign subsequent audits to the commencement date, with the next audit period running 1 June 2026 to 5 November 2026 (a transitional period), and annual periods of 6 November to 5 November thereafter.

The re-casting of the audit period also reclassifies Conditions 23 and 24, grouped and treated as Not Applicable in the draft methodology, which assumed this was the first audit conducted on the correct cycle, into active findings assessed separately.

5. Methodology

The audit was conducted in accordance with the EPBC Act Independent Audit and Audit Report Guidelines (2019), using the following methods:

5.1. Desktop Review

Review of the EPBC approval documentation, AMP (Rev 15 and Rev 16) and associated sub-plans, compliance reports, monitoring datasets (including laboratory data, telemetry and water quality records), spatial data (clearing extents and disturbance footprints), published plans and reports, and correspondence with DCCEEW.

5.2. Site Inspection

A site inspection of the project area was undertaken on 9/07/2026, including inspection of erosion and sediment control measures, water quality management infrastructure, exclusion zones and screening, construction areas, and drawdown management infrastructure. The site inspection record and photographic log are at Appendix C.

5.3. Interviews

Interviews were held with key project personnel from Seqwater and John Holland, including the Environmental Representative, the project manager, and monitoring staff. Personnel consulted are listed at Appendix D.

5.4. Online verification

Review of the approval holder's website to confirm publication of plans, compliance reports and audit reports.

5.5. Limitations and Assumptions

- This audit is based on evidence made available by the approval holder and its contractor, and on third-party monitoring reports prepared for the project. The auditor has relied on those reports as accurate representations of the monitoring undertaken.
- Certain findings depend on DCCEEW's position on matters not yet resolved at the date of this report, including the commencement date and reporting/audit cycle alignment (the subject of the approval holder's Condition 21 self-report), and the status of incident notifications under Conditions 21 and 22. Condition 28 has been assessed Compliant on the basis that DCCEEW's email of 14 August 2025 is treated as the Department's acceptance of the notice given for Revision 15.

6. Commencement Date Assessment (Conditions 14 and 15)

Assessment of the commencement date of the action was a specific scope item for this audit and is material to Conditions 14, 15, 20 and 23. This section sets out the evidence and the auditor's assessment.

6.1. Definition of Commencement

The approval defines "commencement of the action" as the first instance of any specified activity associated with the action, including clearing, lake drawdown and construction, and excludes only narrow minor physical disturbances (pre-clearance surveys and monitoring; signage and temporary fencing; protection of assets from fire, weeds and pests using existing tracks; and temporary site facilities for pre-commencement activities where there is no impact on protected matters). "Construction" includes preliminary site preparation involving breaking of the ground and the laying of pipes.

6.2. Evidence and Timeline

Date	Event
7 November 2019	EPBC Approval 2017/8078 issued. Five-year commencement window under Condition 15 expires 7 November 2024.
10 August 2020	Variation of Conditions (Conditions 3, 7 and the Independent expert definition). Approval date and Conditions 15/23 unchanged; approval expiry 30 June 2035.
6 November 2024	Commencement of the action (adopted date); early works, mobilisation of plant to site. Within the five-year window.
7 November 2024	First commencement notification to DCCEEW (Seqwater ref D24/283386, Olivia Newman), notifying the 6 November 2024 commencement (within 10 business days).
13 November 2024	Alternative commencement date later cited in the Condition 21 self-report (site establishment / early works).
26 May 2025	Commencement of lake drawdown.
30 May 2025	Second commencement notification to DCCEEW (Seqwater ref D25/103857, Richard Plowes), citing 26 May 2025; conflicting with the 7 November 2024 notification.
3 July 2026	Approval holder self-reported a potential non-compliance to DCCEEW under Condition 21 (commencement date / cycle alignment).

6.3. Assessment - Condition 14 (notification within 10 business days)

The core Condition 14 obligation, written notification of the commencement date within 10 business days, was met. The contemporaneous notification (D24/283386, 7 November 2024) notified the 6 November 2024 commencement the following day. However, the approval holder subsequently issued a second, conflicting notification (30 May 2025, citing 26 May 2025) and later self-reported a third date (13 November 2024), and operated on the incorrect 26 May 2025 basis. This duplicate and inconsistent notification record is a process deficiency that directly caused the misalignment of the Condition 20 and Condition 23 cycles and has been self-reported to DCCEE under Condition 21.

Rating: Compliant (Y) - the timing obligation under Condition 14 was fully satisfied. The subsequent duplicate and inconsistent notification is not itself a breach of Condition 14 but caused the misalignment of the Condition 20 and Condition 23 cycles, assessed separately as Non-Compliant against those conditions.

6.4. Assessment - Condition 15 (commencement within five years)

On the contemporaneous record (notification D24/283386), commencement of the action occurred on 6 November 2024, one day before the five-year window closed (7 November 2024), so the action commenced within the window and no prior written Ministerial agreement was required.

Rating: Compliant (Y). This finding depends on which commencement record is accepted. The approval holder's records give three different dates. Only the earliest, 6 November 2024, recorded in notification D24/283386, falls within the five-year window. Had either later date been accepted as the commencement of the action (13 November 2024, cited in the Condition 21 self-report, or 26 May 2025, cited in the second notification), the action would have commenced outside that window, and Condition 15 would then have required the Minister's prior written agreement. No such agreement was sought or given.

The auditor has adopted 6 November 2024, being the date recorded closest to the event and before any question as to its significance arose. The approval holder should formally confirm the commencement date with DCCEE to resolve any remaining uncertainty.

7. Flow-on to Conditions 20 and 23

Because the annual reporting (Condition 20) and audit (Condition 23) cycles were structured to the 26 May 2025 date, the first 12-month reporting and audit periods do not align with the actual commencement (6 November 2024). This audit has been re-cast accordingly, and the cycles require realignment. See the findings for Conditions 20.a and 23.

8. Summary of Compliance Findings

8.1. Findings distribution

All 63 condition elements addressed by the audit criteria were assessed. No element was left outstanding or deferred. Findings are distributed as follows:

Rating	Code	Count	Comment
Compliant	Y	39	
Non-Compliant	N	4	Conditions 20.a (annual reporting cycle) and 23 (independent audit cycle), both arising from the commencement-date error. Conditions 21 and 22 (a reportable water-quality incident not notified within 2 business days).
Not Applicable	NA	20	Register at Appendix B.

Distribution across the two parts of the approval:

Part	Y	N	NA	Total
Part A - Conditions specific to the action (1–13)	29	0	9	38
Part B - Standard administrative conditions (14–32)	10	4	11	25
Total	39	4	20	63

8.2. Part A - Conditions Specific to the Action

No non-compliance was identified against any condition specific to the action. Of the 29 elements assessed as applicable, all were found compliant.

The substantive protections were implemented as approved. Construction and clearing remained within the approved project area and clearing extent; the initial lake drawdown was completed in July 2025, before the prohibited 1 September to 28 February window, at release rates well below the bankfull rate for Six Mile Creek; the siphon inlet fish-exclusion screening operated within its design approach velocity; and the aquatic fauna salvage and relocation program was undertaken under permit by suitably qualified persons, with only permitted species relocated, no relocation to prohibited catchments, and no recorded mortality or injury of a protected matter.

Conditions 5.a.ii and 5.e.iv were assessed Compliant. The matters identified concern verification and follow-through rather than any failure of the management measures themselves. Both relate to water quality. The low dissolved-oxygen at DS01 in September 2025 was traced to a faulty monitoring probe. Diagnostic BOD testing for the broader investigation of low dissolved oxygen downstream is ongoing, round 1 was inconclusive, and round 2 is due in August 2026.

8.3. Part B - Standard Administrative Conditions

Four non-compliances arise in Part B. The first two, the annual compliance reporting cycle (20.a) and the independent audit cycle (23), arise from a single cause being that the approval holder proceeded on the basis that the action commenced on 26 May 2025 rather than 6 November 2024, and structured its annual reporting and independent audit cycles to that later date. The consequences are that the annual compliance report for the audit period has not been prepared or published (20.a), and that no independent audit was conducted for the first 12-month period until this audit was re-cast during its conduct (23). The approval holder has self-reported the underlying error to the Department under Condition 21. The third and fourth non-compliances are separate and both relate to a high-risk dissolved-oxygen exceedance at DS01 (28–31 January 2026), recorded by the approval holder as an incident: it was not notified to the Department within 2 business days as Condition 21 requires (see 21), and full details of it were not subsequently provided within 10 business days as Condition 22 requires (see 22); no impact to MNES was identified and both non-compliances are procedural.

Two further Part B elements were rated Compliant. For Condition 14, the core notification-timing obligation was met, though the duplicate and inconsistent commencement notifications gave rise to the cycle misalignment addressed above. For Condition 28, notice of Revision 15 of the Adaptive Management Plan was given less than 20 business days before implementation. DCCEE's correspondence at the time is treated as the Department's acceptance of the shorter notice period. A further five elements were rated Not Applicable as not triggered within the audit period; the notification, continued-availability, sensitive-data and full-report requirements at 20.b to 20.e cannot be assessed until an annual compliance report is published. Likewise, the preparation of spatial data under the Biological Survey and Mapped Data Guidelines (2018) was not triggered (19).

Conditions 24 to 27 and 29 to 32 were satisfied or not triggered. Of particular note, the auditor nomination and audit criteria approval process under Condition 24 was properly followed, and the plan revision pathway under Condition 27 was correctly available to the approval holder.

8.4. Overall Pattern

The findings show a project implementing its substantive environmental protections effectively, while its administrative compliance systems have not kept pace. Every non-compliance concerns notification and reporting obligations rather than environmental performance, with none being associated with any identified impact on a Matter of National Environmental Significance.

8.5. Effectiveness of Management Measures

In addition to compliance, the audit assessed whether the management measures achieved their intended environmental outcomes.

8.5.1. Drawdown Management

The initial lowering was completed in July 2025 over a period exceeding the minimum four weeks, at a maximum recorded release of approximately 403 ML/d against a bankfull rate of approximately 864 ML/d. The lake was then held at its operating level throughout the prohibited 1 September to 28 February window. The measure achieved its purpose with releases within the receiving capacity of Six Mile Creek, and no downstream geomorphic impact identified.

8.5.2. Fish Exclusion Screening

Approach velocities measured directly in front of the exclusion mesh, with all five siphons operating, averaged 0.051 m/s with a maximum of 0.08 m/s, below the 0.1 m/s design velocity and well below the swim speeds of the native fish present. Inspection records confirm the screening was maintained in service throughout the drawdown. The measure is operating as designed and no entrainment was recorded.

8.5.3. Salvage and Relocation

Structured salvage operations were completed under permit at each stage of the drawdown, relocating substantial numbers of fish to assessed sites. No mortality or injury of a protected matter was recorded, no threatened turtle species was encountered, and no species outside the permitted set was relocated. The measure achieved its objective of avoiding harm to protected matters during the loss of aquatic habitat. The long-term success of the relocation program cannot yet be confirmed. Monthly site and water-quality monitoring continued for the required period, but those records do not establish whether the relocated populations have persisted.

8.5.4. Water Quality Management

Monitoring was implemented at the required frequency and locations throughout, and trigger exceedances were detected and acted upon. A sustained low dissolved-oxygen trend downstream at DS01 prompted an operational response, pulsing discharges through the siphons and modifying dewatering infrastructure to allow lower flow rates, continued as periodic freshwater flushes. The monitoring system is therefore working as intended in detection and response. Its effectiveness in resolving the underlying condition is not established, with exceedances continued through to April 2026. Two potential causes have been identified but not confirmed, and the BOD testing proposed to diagnose the cause has not been completed. No associated fish distress was observed at the affected location.

8.5.5. Habitat Monitoring

The habitat monitoring program was implemented across all six sites, and no habitat trigger value was exceeded during the audit period. As no exceedance occurred, the associated corrective-action process has not been tested in practice.

8.5.6. Overall

The management measures under the Adaptive Management Plan were effective in achieving their principal objective, avoiding harm to Matters of National Environmental Significance during the lake drawdown and construction. Detection systems performed as intended, and where triggers were exceeded, responses were initiated. Two limitations qualify this opinion. The September 2025 DS01 low dissolved-oxygen readings were resolved as a monitoring-probe malfunction, and the diagnostic BOD testing of the downstream low-DO investigation is in progress (round 1 inconclusive; round 2 due August 2026), so the cause of the broader low-DO pattern is not yet confirmed. The long-term success of the relocation program cannot yet be confirmed. Monthly site and water-quality monitoring continued for the required period, but those records do not establish whether the relocated populations have persisted.



8.6. Detailed Audit Findings

The complete audit criteria and methodology matrix follows, addressing every condition element of EPBC Approval 2017/8078. For each element, the matrix records the condition/criteria, verification method, evidence, documents sighted, determination and compliance finding. Conditions rated Not Applicable are supported by the register at Appendix B.

9. Audit Criteria and Methodology Matrix

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
Condition 1 – The approval holder must:						
1.a	Construction must not be undertaken outside the project area as designated by the solid red line on the map at Appendix A of the approval.	Review approved project drawings, CEMP, and GPS/spatial records of construction activities. Review disturbance footprint mapping and compliance reports. Site inspection to verify works remain within the project area boundary.	A finalised survey overlay ('Clearing To date', drawing M5500 1014 050, Rev A, 27/05/2026, prepared by Minstaff Survey for John Holland) depicts the cleared and disturbed works footprint against the site boundary. The approval holder advises clearing has been finalised and that the disturbance did not extend outside the designated boundary. This was generally verified during the auditor's site inspection, which confirmed works remained within the project area.	Clearing Boundary Overlay: 'Clearing To date', drawing M5500 1014 050, Rev A, dated 27/05/2026 20260528_Clearing_Boundary_Overlay .pdf; and Auditor site inspection.	Compliant - The finalised clearing/disturbance survey overlay shows the works footprint contained within the designated boundary, and the site inspection generally verified that construction remained within the project area. As the overlay is a 'clearing to date' survey, it is recommended the disturbance footprint be confirmed specifically against the approved project-area boundary (the solid red line at Appendix A of the approval) to fully close out this condition.	Y
1.b	Clearing must not be undertaken outside the clearing extent as designated by the yellow dotted line on the map at Appendix A of the approval.	Review clearing records, CEMP, and GPS/spatial data documenting the actual clearing extent. Review pre- and post-clearing vegetation mapping shapefiles. Site inspection to verify no clearing beyond approved extent.	Clearing has been finalised. The clearing boundary overlay survey ('Clearing To date', drawing M5500 1014 050, Rev A, 27/05/2026, Minstaff Survey for John Holland; MGA2020 Zone 56 / AHD) maps the actual clearing extent against the designated clearing boundary and shows that clearing did not extend outside that boundary. This was generally verified during the auditor's site inspection.	Clearing Boundary Overlay: 'Clearing To date', drawing M5500 1014 050, Rev A, dated 27/05/2026 20260528_Clearing_Boundary_Overlay .pdf; and Auditor site inspection.	Compliant - Clearing is finalised and the survey overlay confirms it did not extend beyond the designated clearing extent, consistent with the condition. This was generally verified during the site inspection.	Y
1.c	The lake drawdown must not be undertaken between 1 September and 28 February.	Review drawdown schedule (AMP Rev 15 Section 2.2) and water level logs for Lake Macdonald. Confirm commencement and cessation dates of drawdown activities are outside the 1 September–28 February window.	Siphon operations log records the initial lake lowering commencing 30 May 2025, with Lake Macdonald reaching its ~93 m AHD operating target (~42% FSL) by July 2025. Recorded lake levels were then held between ~92.5 m and ~93.4 m AHD across the entire 1 September 2025 - 28 February 2026 period (1 Sep: 93.04 m; 28 Feb: 93.41 m), i.e. no net	Lowering siphon ops.xlsx (tabs 'ops records' and 'lake lvl', daily records 30 May 2025 - 13 Jul 2026); AMP Rev 15 Section 2.2 and AMP Rev 16 Section 2.2 (supported by both revisions).	Compliant - The initial lake drawdown was completed in July 2025, before the 1 September prohibited window. Water level logs show the lake was held at its operating level (~92.5-93.4 m AHD) throughout 1 September 2025 - 28 February 2026 with no further drawdown.	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			lowering occurred during the prohibited window. Siphon operation continued during this window for inflow/level management (e.g. following rain events), not drawdown. AMP Rev 15 and Rev 16 both state the initial drawdown was completed July 2025 and that drawdown will not occur between 1 September and 28 February.			
1.d	The lake drawdown must not be undertaken in a manner that exceeds bankfull height.	Review drawdown management records, flow gauge data for Six Mile Creek, and water level records (AMP Rev 15 Section 2.4 and Table 32). Confirm release rates did not cause flows exceeding bankfull height. Interview project staff regarding drawdown controls.	Siphon release rates recorded in the operations log did not exceed ~403 ML/d (maximum recorded, five siphons operating), which is well below the Six Mile Creek bankfull rate of 10 m ³ /s (approximately 864 ML/d). AMP Rev 15 and Rev 16 both state the lake drawdown was undertaken in a manner that did not exceed the bankfull height. Corroborated by the AMP, which states the practical siphon release-rate limitation is approximately 5 m ³ /s - itself well below the 10 m ³ /s bankfull rate - consistent with the maximum ~403 ML/d (~4.7 m ³ /s) recorded in the operations log.	Lowering siphon ops.xlsx (tab 'ops records', 'Total ML/d (est)' column); AMP Rev 15 Section 2.3 and AMP Rev 16 Section 2.3 (supported by both revisions).	Compliant - Recorded siphon release rates (max ~403 ML/d) remained well below the Six Mile Creek bankfull rate (~864 ML/d / 10 m ³ /s), consistent with the AMP commitment that drawdown not exceed bankfull height.	Y
Cond. 2 - Prior to the commencement of the action, and to inform the Adaptive Management Plan required under condition three (3), the approval holder must:						
2.a	Identify and map habitat of protected matter(s) within Lake Macdonald and downstream in Six Mile Creek prior to commencement.	Confirmed as Not Applicable, See Appendix B register.	See Appendix B.	See Appendix B.	One-off pre-commencement requirement. Habitat assessment and mapping was completed in July 2020 (AMP Rev 15) and confirmed in the Ministerially-approved AMP. No further action required in this audit period.	NA
2.b	Prior to commencement, the approval holder must develop trigger levels and specify limits for water quality parameters including (but not limited to) temperature, pH, dissolved oxygen,	Review AMP Rev 15 Section 3.3 and Table 32 to confirm trigger levels and limits are documented for all required water quality parameters. Confirm values are established based on	AMP Section 3.3 (Management and Monitoring) and Table 3-2 document site-specific low/high water quality trigger levels derived from baseline monitoring (2019-2024) plus a VIRID	Adaptive Management Plan Rev 15 (LMDIP-05327-GNL-ENV-MPL-00002_15) Section 3.3 and Table 3-2;	Compliant - Water quality trigger levels and limits are documented consistently in both sighted AMP revisions for the required parameters. This is a one-off pre-commencement	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
	turbidity, total suspended solids, nitrogen and phosphorus.	baseline data and relevant water quality objectives (EP(WWB) Policy 2019). Confirm these were in place prior to commencement of the action.	IFC (08/03/2024-16/05/2024), in accordance with the Queensland Water Quality Guidelines 2009, covering temperature, pH, dissolved oxygen, turbidity, TSS, nitrogen and phosphorus. Content is consistent between AMP Rev 15 and Rev 16.	Adaptive Management Plan Rev Rev 16 (LMDIP-05327-GNL-ENV-MPL-00002) Section 3.3 and Table 3-2.	plan-content requirement and the content is confirmed present.	
Adaptive Management Plan						
Condition 3 - For the protection of protected matter(s), the approval holder must submit an AMP prepared by a suitably qualified and experienced person for the Minister's approval. The AMP must not be commenced until approved in writing by the Minister. The approved AMP must be implemented for the duration of the action. [Varied 10 August 2020]						
3.1	The AMP must be prepared by a suitably qualified and experienced person and submitted to the Minister for approval. The action must not commence until the AMP is approved in writing.	Confirmed as Not Applicable, See Appendix B register.	See Appendix B.	See Appendix B.	Pre-commencement administrative requirement. Ministerial approval of AMP Rev 15 confirms compliance. The audit focuses on implementation rather than plan approval.	NA
3.2	The approved Adaptive Management Plan must be implemented for the duration of the action. The current approved instrument is AMP Rev 15 (August 2025).	Review implementation evidence across all AMP components including water quality management, erosion and sediment control, aquatic fauna management, and biosecurity. Review compliance reports, monitoring datasets, and site inspection observations against AMP Rev 15 requirements. Interview approval holder and contractor environmental staff. Confirm the current AMP version is the approved/current instrument.	The quarterly compliance report evidences ongoing, active implementation of AMP Rev 15 across the 20 August - 30 November 2025 period: water quality monitoring assessed against 'Adaptive Management Plan v15 (post 18 August 2025)' threshold criteria (Tables 6-8), the AMP habitat monitoring program (Appendix F) executed at all six sites, and Table 10 activities cross-referenced to specific AMP sections.	LMDIP Quarterly Compliance and Monitoring Summary Report (LMDIP-10000-GNL-ENV-REP-00002, Rev 2, 15/01/2026), Section 5, Appendix A and Table 10.	Compliant - Water quality criteria, the habitat monitoring program and salvage/relocation activities are all explicitly tied to AMP Rev 15, evidencing its ongoing implementation for this reporting period.	Y
Condition 4 - The AMP must be reviewed by an independent expert in relation to each of the protected matter(s). The review must be provided to the Department at the time the AMP is submitted for the Minister's approval.						
4	Independent expert review of the AMP must be provided to the Department at the time of AMP submission for Ministerial approval.	Confirmed as Not Applicable, See Appendix B register.	See Appendix B.	See Appendix B.	Pre-approval administrative requirement. Ministerial approval of AMP Rev 15 confirms independent expert reviews were received by DCCEE. No current-period implementation obligation arises from this condition.	NA

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
Condition 5 - The AMP must be consistent with the EMP Guidelines (2014) and must include the elements specified in conditions 5(a)–5(e). The audit assesses implementation of the approved AMP commitments against these elements.						
5.a.i	AMP to include details of how construction and lake drawdown (both gradual 12-week and rapid release scenarios) will be managed to avoid/mitigate negative impacts on habitat of protected matter(s). [Audit: verify implementation of habitat management commitments in AMP Rev 15.]	Review AMP Rev 15 Sections 5.3, 5.4 and associated tables against mapped MNES habitat. Review site records, monitoring data, and erosion and sediment control implementation. Site inspection of relevant habitat protection controls and exclusion zones. Confirm implementation consistent with both drawdown scenario plans.	Implementation of the siphon inlet fish-exclusion screening was verified during the site audit (the auditor viewed the underwater drone footage and daily inspection logs on site). The supporting inlet-flow velocity assessment is provided in the Fishology quarterly monitoring report (Section 1.5): the AMP requires assessment of flow velocity at the entrance to the siphon system to ensure flows are not excessive or unsuitable for fauna. Flows were measured with a Swoffer 2100 flow meter across 17 points along the front of the inlet, directly in front of the exclusion mesh, at 3.5 m intake depth, with all five siphons releasing (the highest-flow scenario the system can produce). Results: mean 0.051 m/s, standard deviation 0.017, minimum 0.01 m/s, maximum 0.08 m/s - all below the 0.1 m/s design velocity and well below the recorded swim speeds of Australian native fish.	Underwater drone footage of inlet screening and daily inspection logs (viewed on site during the audit); Lake Macdonald Quarterly Monitoring Report 1 (Fishology Consulting), Section 1.5 'Flow characterises at siphon inlet' (and Section 2.3.3 Velocity data); AMP Rev 15 / Rev 16 Section 2.2 (inlet exclusion screen design, 0.1 m/s velocity).	Compliant - Implementation of the inlet fish-exclusion screening was verified during the site audit, and inlet-flow velocity data contained in the Fishology quarterly monitoring report. Measured approach velocities directly in front of the exclusion mesh (mean 0.051 m/s, maximum 0.08 m/s, with all five siphons operating) are below the 0.1 m/s design velocity and well below native fish swim speeds, confirming the measure operates to protect fauna as intended.	Y
5.a.ii	AMP to include management to avoid exceedance of water quality trigger levels and limits, and to initiate flow reduction or pause if limits are exceeded. [Audit: verify trigger monitoring and adaptive management response records.]	Review AMP Rev 15 Section 3.3 and Table 32. Review continuous and periodic water quality monitoring datasets. For any recorded exceedances of low or high trigger values, confirm documented adaptive management responses were implemented. Review corrective action records. Interview environmental monitoring staff.	The Master Water Quality Register records monitoring against the AMP/SWMP threshold values (tab 'Threshold Values (AMP-SWMP)'). Multiple trigger exceedances are recorded: at the Lake Macdonald AMP upstream site, turbidity and pH exceeded the high-risk triggers on numerous occasions across Jan 2025 – May 2026. At the Six Mile Creek AMP downstream site, dissolved oxygen fell below the high-risk triggers on numerous occasions across Jun 2025	01. Master Water Quality Register.xlsx (tabs 'Threshold Values (AMP-SWMP)', 'AMP Upstream', 'AMP Downstream'). LMDIP-10000-GNL-ENV-REP-00002 (Rev 2, 15/01/2026); LMDIP-10000-GNL-ENV-REP-00003 (Rev 1, 20/03/2026), Table 3, Table 8 and Section 2 (SQP habitat monitoring); Fishology quarterly monitoring reports. Water Quality TARP – DS01 (22-09-25 to 02-10-25, "Incident: No"); Water Quality TARP – DS01 (28-01-26 to 31-01-26, "Incident: Yes"). BOD sampling	Compliant - High-risk downstream dissolved-oxygen exceedances are recorded and an adaptive-management response is evidenced. Two DS01 events are highlighted, the September–October 2025 readings were a monitoring-probe malfunction (verified against the control site and a handheld probe, logged "Incident: No"), while the 28–31 January 2026 event was a genuine sustained high-risk exceedance (<36% DO for more than 48 hours, in situ-confirmed), for	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			– Jun 2026, together with lower-risk pH and turbidity exceedances. The batch registers do not themselves document the adaptive-management / corrective responses (flow reduction or pause) required by the AMP for these exceedances. The DS01 low-dissolved-oxygen record across 24 July 2025 to 24 April 2026 comprises two distinct events. The September–October 2025 readings (DO below 10%) were investigated under a water-quality TARP and attributed to a malfunctioning monitoring probe, verified against the control site (80–100% DO) and a handheld probe, and logged "Incident: No". The 28–31 January 2026 event was, by contrast, a genuine sustained exceedance: DO sat in the high-risk band (<36%) for more than 48 hours, confirmed by in situ probe sampling (not an instrument artefact). For the January event the AMP adaptive-management response is evidenced, comparison against the control site (>70% DO), increased monitoring and sampling through the water column, mobilisation of an aeration trailer (late January to early March 2026), and downstream monitoring for distressed fish, with none observed; DO recovered following a rain event on 15 February 2026. The approval holder's TARP recorded that event as "Incident: Yes"; it was not notified to the Department, and the resulting Condition 21 notification failure is assessed separately at item 21.1. Across the wider period the quarterly reports evidence an adaptive-management response (pulsing discharges through the siphons and	results, January and March 2026 (BOD monitoring record, 18/03/2026). LMDIP Incident and Non-Compliance Register (provided July 2026).	which the AMP response was implemented, aeration, increased monitoring, and downstream checks for distressed fish, with none observed and DO recovering after rainfall on 15 February 2026. The failure to notify that January incident under Condition 21 is assessed separately as a non-compliance at item 21.1. The adaptive-management response required by Condition 5.a.ii was implemented and is evidenced, the batch registers do not consistently document the corrective responses, and the diagnostic BOD testing is incomplete (round 1 inconclusive, round 2 due August 2026), so the cause of the broader low-DO pattern remains undiagnosed. This is not, however, a failure of the management measure required by this condition, which has been implemented as evidenced above.	

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			modifying dewatering infrastructure to allow lower flow rates (REP-00002), continued as 'fresh flushes' downstream when low DO is detected (REP-00003)), and high-risk downstream DO exceedances continue (5% of events in REP-00002; 10% at DS01–DS04 in REP-00003). The SQP advice on both TARPs links the low DO to high-biological-oxygen-demand lake water released via the siphons; the Fishology monitoring report similarly notes low DO at all sites below Lake Macdonald in January 2026 and recommends BOD testing to confirm the cause. Diagnostic BOD sampling was undertaken in January and March 2026 (round 1, low and inconclusive), with a second round scheduled for August 2026. Interview evidence: in discussions during the audit with Seqwater's Environmental and Sustainability Manager, Simon Orchard, and Nathan Carruthers (Senior Environmental Advisor), the approval holder attributed the low dissolved-oxygen readings to water ponding at the downstream site and to high-BOD lake water, and advised that the location was frequently monitored for fish distress throughout, with none observed.			
5.a.iii	AMP to include management to avoid injury and mortality of protected matter(s) from lake drawdown equipment and the temporary cofferdam.	Review AMP Rev 15 Table 53, Section 5.4 and Section 5.5 fauna protection commitments. Review salvage records, species capture/mortality logs, and incident registers for any protected matter injuries or mortalities. Site inspection to verify cofferdam exclusion zones and drawdown equipment management.	The Fish Net Monitoring Inspection Record documents regular inspections of the siphon intake fish-exclusion nets (9 mm x 9 mm aperture screens described in the AMP) between 11 July 2025 and 7 November 2025, with inspection status recorded against periods of siphon operation	Fish Net Monitoring Inspection Record.xlsx (tab 'Sheet1', 11 Jul - 7 Nov 2025); AMP Rev 15 / Rev 16 intake exclusion screen commitments (Section 2.2 fauna protection). AMP Rev 15 / Rev 16 Section 2.2 (intake exclusion net design specification).	Compliant - Implementation of the intake fish-exclusion nets is evidenced.	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			(inspections stood down when siphons were not operational). Evidence provided supporting the implementation of a drawdown-equipment fauna-protection measure. Design-specification measures include siphon inlets are fitted with 9 mm x 9 mm diamond-mesh nylon netting on a float, with frame geometry ensuring approach velocities do not exceed 0.1 m/s to prevent fish attraction/entrainment.			
5.b	Management measures must take into account relevant approved conservation advices and be consistent with recovery plans and threat abatement plans for each MNES species.	Review AMP Rev 15 Section 5.4 and Table 54 against current approved conservation advices, recovery plans and threat abatement plans for Mary River Cod, Australian Lungfish, Mary River Turtle, White-throated Snapping Turtle, and Giant Barred Frog. Confirm management measures implemented in the field are consistent with these instruments.	The AMP (Rev 15 and Rev 16) includes Table 5-4 'Compliance with Conservation Advice, Recovery Plans and Threat Abatement Plans', which for each of the five MNES species identifies the relevant approved conservation advice / recovery plan, the key threats relevant to the project, the key management actions, and how the AMP's measures comply. The instruments taken into account are: Australian Lungfish: Approved Conservation Advice for <i>Neoceratodus forsteri</i> (11 April 2014); Giant Barred Frog: Conservation Advice for <i>Mixophyes iteratus</i> (13 July 2017) and the Recovery Plan for stream frogs of south-east Queensland 2001-2005; Mary River Cod: Conservation Advice for <i>Maccullochella mariensis</i> (16 December 2016) and The Mary River Cod Research and Recovery Plan Mary River Turtle: Approved Conservation Advice for <i>Elusor macrurus</i> (26 March 2008); and White-throated Snapping Turtle: Approved Conservation Advice for <i>Elseya albagula</i> (7 November 2014)	Adaptive Management Plan Rev 15 (LMDIP-05327-GNL-ENV-MPL-00002_15) Section 5.4 and Table 5-4; and Rev 16 (LMDIP-05327-GNL-ENV-MPL-00002) Section 5.4 and Table 5-4 (content consistent across both revisions). Referenced conservation instruments as cited in AMP Table 5-4 and the AMP reference list.	Compliant - The AMP takes into account the relevant approved conservation advices and is consistent with the recovery plans and threat abatement plans for each of the five MNES species, as documented in Table 5-4, which maps the key management actions to the identified threats and the relevant instrument for each species. The field management measures reviewed in this audit (drawdown rate, bankfull limit, water quality and erosion management, salvage and relocation, clearing footprint, and pest-fish and hygiene controls) are consistent with those instruments.	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			and the National Recovery Plan for the White-throated Snapping Turtle (2017). For each species, Table 5-4 links the identified threats (e.g. dams/impoundments and movement barriers, changes to flow regime, degradation of water quality, riparian vegetation clearing, exotic fish species, disease/chytrid) to specific AMP management measures, including salvage and relocation of aquatic fauna in accordance with the AMP, drawdown releases tailored over not less than four weeks, releases not exceeding the bankfull height of Six Mile Creek, water quality and erosion management (sections 3.3 and 4.3), restriction of clearing to the IAR-approved footprint (Table 6-1), pest/exotic fish management (section 5.5.9 and Table 7-1), and chytrid hygiene protocols (with frogs not targeted during salvage). Implementation of these measures is corroborated by evidence reviewed elsewhere in this audit: the drawdown rate and bankfull compliance (Conditions 1.c and 1.d), water quality monitoring and management (Conditions 5.a.ii and 5.e), the salvage and relocation records in the Fishology quarterly monitoring reports (Conditions 9 and 10), and the clearing footprint (Conditions 1.a and 1.b).			
5.c	AMP to include habitat remediation measures for protected matter(s) within Lake Macdonald and downstream in Six Mile Creek.	Review AMP Rev 15 Section 9 for habitat remediation commitments. Where drawdown has occurred and impacts to habitat have been detected, review records of remediation activities undertaken (e.g. snag replacement, bank stabilisation).	Habitat remediation status: vegetation die-back following lake refilling is identified as a new risk yet to be managed; no bank subsidence was noted during drawdown;	LMDIP quarterly compliance report Section 5; Fishology quarterly monitoring reports.	Not Applicable - habitat remediation measures are documented; implementation (notably post-refill vegetation dieback works) is not yet due, as the project has not reached the rehabilitation stage.	NA

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
		Site inspection of remediated areas. Confirm remediation triggered by monitoring results is being implemented.	blackwater is identified in Section 5 of the compliance report; bank-height data is recorded in the Fishology reports.			
5.d	AMP must include measures to review and update the plan if protected matter(s) not previously identified are found within 10 km of the project area. [Audit: verify triggers have been monitored and plan update procedures are functional.]	Review AMP Rev 15 Section 1.7 and Section 8.5. Confirm the plan review trigger (new protected matter found within 10 km) is documented and understood by project staff. Review records for any instances where new species were detected and confirm plan update procedures were followed if triggered.	AMP Section 1.7 (Review of Plan) documents a plan review/update trigger (e.g. protected matters not previously identified within the project area or a 10 km radius being found in Lake Macdonald or downstream in Six Mile Creek, among other triggers). Content is consistent between AMP Rev 15 and Rev 16.	Adaptive Management Plan Rev 15 (LMDIP-05327-GNL-ENV-MPL-00002_15) Section 1.7; Rev 16 (LMDIP-05327-GNL-ENV-MPL-00002) Section 1.7.	Compliant - The required review/update measure is documented consistently in both sighted AMP revisions. No instance of a previously-unidentified protected matter has been recorded.	Y
5.e.i	Monitoring program: timing, frequency and location during drawdown/construction to detect impacts on habitat for protected matter(s) and water quality trigger exceedances.	Review AMP Rev 15 Section 3.3, Table 32, Section 6.3 and Appendix F. Verify monitoring at three downstream sites, two control sites, and one Lake Macdonald site is being implemented at specified frequencies. Review monitoring records and data completeness. Confirm NATA-accredited laboratory analysis is being used for relevant parameters.	Water quality monitoring was undertaken at the Lake Macdonald AMP (upstream) site and Six Mile Creek AMP (downstream) sites, with additional stilling basin, stormwater and background/control sampling, recorded from January 2025 through the drawdown period (May-Jul 2025) and ongoing construction. The AMP Upstream and AMP Downstream datasets contain ~360+ dated monitoring records each. Siphon operation and fish-exclusion net inspections during drawdown are also recorded. Compliance records are maintained in the Soteria system. Eurofins NATA laboratory certificates cited.	01. Master Water Quality Register.xlsx (tabs 'AMP Upstream', 'AMP Downstream', 'Stilling Basin', 'Background'); Lowering siphon ops.xlsx; Fish Net Monitoring Inspection Record.xlsx. 01. Master Water Quality Register.xlsx (tabs 'Upstream Logger', 'Downstream Logger', 'DS01 Real-time(Jun-Aug25)'). Eurofins Certificate of Analysis – 1343341 – W_report.pdf, Project LMDIP for John Holland Queensland Pty Ltd. April 7 2026.	Compliant - Monitoring during the drawdown and construction period is being implemented at the Lake Macdonald and downstream sites with regular dated records against AMP trigger parameters.	Y
5.e.ii	Monitoring program: timing, frequency and location post-drawdown/construction to detect impacts on protected matter(s).	Review AMP Rev 15 Sections 3.3, 5.4, and 5.5.11 and Table 53. Where drawdown or construction is complete or in progress, confirm post-activity monitoring is being implemented (or is scheduled) in accordance with the plan. Review monitoring records and reporting.	The AMP Upstream and AMP Downstream water quality datasets continue past completion of the initial drawdown (July 2025) through to July 2026, demonstrating post-drawdown monitoring is ongoing at the required locations.	01. Master Water Quality Register.xlsx (tabs 'AMP Upstream', 'AMP Downstream' - records extending to 3 Jul 2026 and 10 Jul 2026 respectively).	Compliant - Post-drawdown water quality monitoring is being conducted and recorded at the AMP monitoring sites, continuing beyond completion of the initial drawdown in July 2025.	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			Independently corroborated by the AMP Upstream/Downstream datasets showing continuous monitoring through to 10 July 2026 with no apparent gap in coverage.			
5.e.iii	Monitoring program: details and timing of adaptive management measures/corrective actions if negative impacts on protected matter(s) habitat are detected (including reducing or ceasing drawdown/construction).	Review AMP Rev 15 Tables 53 and 61 and Appendix F for documented corrective action triggers and responses for habitat impacts. Confirm corrective action thresholds and response procedures are documented for each MNES species. Review records of any corrective actions triggered and confirm they were implemented within specified timeframes.	The quarterly reports state that analysis of habitat monitoring data against the habitat trigger values found no trigger values exceeded during the quarterly monitoring period, across the six habitat monitoring sites (three downstream Six Mile Creek sites, two upstream control sites, and the lake site). This is repeated for the following quarter (REP-00003), so no adaptive-management/corrective response was required in either window.	LMDIP-10000-GNL-ENV-REP-00002 (Rev 2, 15/01/2026) Section 2.2; LMDIP-10000-GNL-ENV-REP-00003 (Rev 1, 20/03/2026) Section 2.	Compliant - The habitat monitoring program is operating and no habitat triggers have been exceeded across two consecutive quarters. Note: As no exceedance has occurred, these documents do not demonstrate the actual corrective-action/adaptive-management response process the condition requires. The action can only be confirmed when an exceedance occurs and a response is documented.	Y
5.e.iv	Monitoring program: details and timing of adaptive management measures/corrective actions if water quality trigger levels are exceeded (including reducing or ceasing drawdown/construction).	Review AMP Rev 15 Section 3.3 and Table 32. Confirm both low-trigger (review/investigate) and high-trigger (reduce or pause releases) responses are documented. Review all water quality monitoring data for any exceedances during the audit period. For each exceedance, confirm the appropriate corrective action was implemented and documented within the required timeframe.	As per 5.a.ii: cross-referencing the register's trigger table against AMP Upstream/Downstream results identifies a material number of high-risk exceedances (104 upstream/control – predominantly turbidity/TSS; 60 downstream, 53 of which are low DO% at DS01 recorded across 24 Jul 2025 – 24 Apr 2026). The Sep–Oct 2025 portion of the DS01 record was subsequently attributed to a monitoring-probe malfunction under a water-quality TARP (verified against the control site and a handheld probe; marked "Incident: NO") and is an instrument artefact rather than a true exceedance. An operational corrective action (pulsed siphon discharges / "fresh flushes") is corroborated across REP-00002 and REP-00003. The BOD diagnostic step is underway .	01. Master Water Quality Register.xlsx (AMP Upstream, AMP Downstream, Threshold Values(AMP-SWMP)); LMDIP-10000-GNL-ENV-REP-00002 (Rev 2, 15/01/2026); LMDIP-10000-GNL-ENV-REP-00003 (Rev 1, 20/03/2026), Table 3, Table 8, Section 2. Water Quality TARP – DS01 (22-09-25 to 02-10-25). BOD sampling results, January and March 2026.	Compliant - Exceedances are recorded and a specific operational corrective action (pulsed siphon discharges) is corroborated across two consecutive quarterly reports, meeting the Condition 5.e.iv requirement to detail and time an adaptive-management/corrective response. The diagnostic BOD testing to confirm the underlying cause is not yet complete so this remains outstanding and should be closed out in the next quarterly compliance report, but does not represent a failure of the corrective-action requirement itself.	Y

Condition 6 - All monitoring and data analysis required under the AMP must be undertaken by a suitably qualified and experienced person(s).

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
6	All monitoring and data analysis required under the AMP must be undertaken by suitably qualified and experienced person(s) as defined in the approval.	Review AMP Rev 15 Section 14.2 for qualification requirements. Review qualifications, credentials, and professional memberships of persons undertaking monitoring and data analysis during the audit period. Review monitoring reports for evidence of SQP involvement. Spot-check laboratory NATA accreditation for analytical data.	The water quality monitoring datasets record the personnel completing each event, including Fishology Consulting (specialist aquatic ecology consultancy) for lab/nutrient sampling and named site personnel for probe monitoring. SQP qualifications were discussed during the audit. John Holland's personnel hiring criteria require relevant university qualifications in the applicable field for these roles, and the CVs of the key project personnel undertaking the monitoring and data analysis have been prepared and submitted to the approval holder (Seqwater). The quarterly compliance report (REP-00002) formally defines a 'Suitably Qualified Professional' (SQP) role (Table 1) and consistently attributes AMP monitoring and data analysis - fish community, habitat, turtle, platypus eDNA and camera trapping, and aquatic habitat assessments - to the SQP, which is stronger evidence of a defined qualified role than the register alone.	01. Master Water Quality Register.xlsx ('Completed by' fields on 'AMP Upstream', 'AMP Downstream', 'Fishology' tabs). LMDIP-10000-GNL-ENV-REP-00002 (Rev 2, 15/01/2026), Table 1 (Definitions) and Table 3, Section 2. Qualifications also discussed during the audit interviews.	Compliant - Monitoring and data analysis under the AMP is being undertaken by suitably qualified and experienced persons. A defined SQP role is evidenced in the quarterly compliance report, specialist input is provided by Fishology Consulting, and John Holland's hiring criteria require relevant university qualifications for the personnel undertaking these roles. The CVs of the key personnel have been prepared and submitted to the approval holder (Seqwater), and qualifications were confirmed in discussion during the audit.	Y
Aquatic Fauna Salvage and Relocation Management Plan – Implementation (Conditions 7, 9, 10)						
Condition 7 - For the protection of protected matter(s) subject to salvage and relocation, the approval holder must submit an AFSRMP prepared by a suitably qualified and experienced person for the Minister's approval. The AFSRMP must be implemented for the duration of the action. [Varied 10 August 2020]						
7	The AFSRMP must be prepared by a suitably qualified and experienced person and submitted to the Minister for approval prior to commencement.	Confirmed as Not Applicable, See Appendix B register.	See Appendix B.	See Appendix B.	Pre-commencement administrative requirement. The AFSRMP is incorporated in AMP Rev 15 Section 5.5. Ministerial approval confirms compliance. Audit focuses on implementation.	NA

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
7.2	The approved AFSRMP must be implemented for the duration of the action. The current approved instrument is AMP Rev 15 Section 5.5.	Review salvage and relocation records, species capture logs, monitoring reports, and compliance reports against all commitments in AMP Rev 15 Section 5.5 (evaluation survey, salvage schedule, capture methods, holding, transport, release, and post-relocation monitoring). Interview approval holder and contractor staff responsible for salvage operations. Site inspection where salvage activities are ongoing or recently completed.	Table 10 (Aquatic Fauna and Salvage Program of Works Summary) cross-references salvage, relocation and monitoring activities to specific AMP sections (5, 5.5.3, 6.3/Table 6.1), and Section 2.11 describes an as-required fish salvage and relocation event (14 October 2025, Six Mile Creek tailwater pool) conducted using the AMP methodology (electrofishing, fyke netting, species-specific handling, downstream relocation).	LMDIP-10000-GNL-ENV-REP-00002 (Rev 2, 15/01/2026), Table 10 and Section 2.11 (Fish salvage).	Compliant - Salvage and relocation activities in this period are directly tied to and consistent with the AMP Section 5.5 (AFSRMP) framework, evidencing ongoing AFSRMP implementation.	Y
Condition 8 - The AFSRMP must be reviewed by an independent expert in relation to each of the protected matter(s). The review must be provided to the Department at the time of submission.						
8	Independent expert review of the AFSRMP must be provided to the Department at time of submission.	Confirmed as Not Applicable, See Appendix B register.	See Appendix B.	See Appendix B.	Pre-approval administrative requirement satisfied. Ministerial approval of the AFSRMP (in AMP Rev 15) confirms independent expert reviews were received. No current-period implementation obligation.	NA
Condition 9 - The AFSRMP must be consistent with the EMP Guidelines (2014) and must include the elements specified in conditions 9(a)–9(d). The audit assesses implementation of AFSRMP commitments against these elements.						
9.a	Management measures must take into account relevant conservation advices and be consistent with recovery plans and threat abatement plans.	Review AMP Rev 15 Tables 54 and 56 against current approved conservation advices for each MNES species. Confirm salvage and relocation methods applied in the field are consistent with the relevant recovery plans and threat abatement plan measures.	The AFSRMP (incorporated in AMP Section 5.5) records that the plan "was developed with regard to relevant approved conservation advice for the MNES species that potentially occur in the project area," with Table 5-4 demonstrating how the management measures are consistent with that advice and Table 5-6 providing salvage details for MNES species. Table 5-4 links each MNES species' conservation advice / recovery plan and project-relevant threats to specific salvage and relocation actions, including salvage and relocation of aquatic fauna in accordance with the AMP, species-specific handling, hygiene/chytrid protocols (frogs not	Adaptive Management Plan Rev 15 (LMDIP-05327-GNL-ENV-MPL-00002_15) and Rev 16 (LMDIP-05327-GNL-ENV-MPL-00002), Section 5.5 (AFSRMP), including the Condition 9 compliance mapping, Table 5-4 (Compliance with Conservation Advice, Recovery Plans and Threat Abatement Plans), Table 5-6 (Salvage details for MNES species) and Section 5.5.8 (Capture Methods); Fishology Consulting Lake Macdonald Quarterly Monitoring Reports 1, 2 and 3 (Fish Salvage sections and summary tables). Referenced conservation instruments as cited in AMP Table 5-4.	Compliant - The AFSRMP salvage and relocation management measures take into account the relevant approved conservation advices and are consistent with the recovery plans and threat abatement plan measures for each of the five MNES species.	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			targeted during salvage), and control of exotic/pest fish species (tilapia, Gambusia). The referenced instruments are those listed at Condition 5.b. The salvage and relocation methodologies are detailed in AMP Section 5.5 (Capture Methods, section 5.5.8; Salvage Schedule and Resourcing, 5.5.7), to be undertaken in accordance with relevant State and Commonwealth guidelines and the applicable fisheries permit. Field implementation is corroborated by the Fishology Consulting quarterly monitoring reports, which record the salvage and relocation methods actually applied, backpack and boat electrofishing, fyke nets and seine nets, species-specific handling, relocation to assessed sites, and euthanasia of pest fish under fisheries-permit conditions. Reports 2 and 3 confirm no threatened fish or turtles were captured or observed during the salvage operations, and Report 3 records the spillway-salvage fish were released in good condition.			
9.b	Risk assessments and risk management measures for each relocation site (disease, weeds/pests, fauna health and safety) must be undertaken and implemented prior to lake drawdown. [Audit: verify risk assessment was completed and controls implemented.]	Review AMP Rev 15 Section 10 (Risk Assessment), Table 53, and Appendix H (Relocation Site Assessment). Confirm the risk assessment was completed prior to drawdown commencement. Review biosecurity protocols (Section 7) applied at each relocation site. Interview project fauna staff regarding implementation of risk management measures during transport and handling.	The AMP addresses relocation-site risk assessment at Section 10, Table 5-3 and Appendix H, recording that a risk workshop and risk assessment were completed for the lake lowering (incorporating fauna salvage and relocation) and that a detailed assessment of relocation sites was undertaken to determine suitability, with visual monitoring of the sites. A pre-relocation site inspection was completed on 16 April 2025 by SMEC (prior to lake drawdown).	MP Rev 15 (LMDIP-05327-GNL-ENV-MPL-00002_15) / Rev 16 (LMDIP-05327-GNL-ENV-MPL-00002) Section 10 (Risk Assessment), Table 5-3 and Appendix H (Relocation Site Assessment); SMEC pre-relocation site inspection (16 April 2025); Fishology Consulting Lake Macdonald Quarterly Monitoring Report 1, Section 3.2.2 (Biosecurity obligations), Sections 5.2.3 and 5.3.1 (Relocation site assessment), Section 5.3.2	Compliant - Risk assessments and risk-management measures for the relocation sites, covering disease, weeds/pests and fauna health and safety, were undertaken and implemented. The AMP records a risk workshop and risk assessment for the lake lowering (Section 10 / Appendix H); a pre-relocation site inspection was completed by SMEC on 16 April 2025 (prior to drawdown); and	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			Fishology Consulting developed a biosecurity risk assessment for the relocation program (QMR1, §3.2.2), in association with Seqwater biosecurity personnel and incorporated into the salvage methodology, to prevent the spread of weeds (<i>Salvinia molesta</i>, <i>Hygrophila costata</i>) and pathogens/disease between Lake Macdonald and Cooloolabin Dam. Implemented risk-management measures included staff weed-awareness education, washdown and inspection of vehicles and trailers before and after transport, exclusive use of Cooloolabin Dam water in transport trailers, washing of fish in clean water before transport, isolation of equipment used in Lake Macdonald, no water releases back into Cooloolabin Dam, and no boat use in Cooloolabin Dam. Fishology undertook a visual relocation-site assessment on 7 June 2025 (QMR1, §5.2.3 and Section 5.3.1), assessing parking/access, water quality, habitat volume and adjacency, microhabitat, aquatic macrophytes, streamflow and carrying capacity for each candidate site, with results tabulated (Tables 5.1 and 5.2); one site (site 37) was excluded as it was on private property, and primary Mary River Cod relocation sites were selected. Fauna health-and-safety risk (stranding/stress) was managed through drawdown-period inspections for fish strandings and stress (Section 5.3.2).	(drawdown monitoring), and Tables 5.1–5.2.	Fishology developed and implemented a biosecurity risk assessment with Seqwater biosecurity personnel (weed and pathogen controls) and conducted a documented relocation-site suitability assessment. The biosecurity risk-management measures were applied in the field during salvage and transport. Note: the timing of the Fishology relocation-site suitability survey (7 June 2025) relative to the commencement of lake drawdown is assessed separately under Condition 9.d.i; the risk assessments relevant to this condition (biosecurity/disease/weeds-pests and the AMP risk workshop) were completed for, and prior to, the drawdown.	
9.c	Detailed methodologies for salvage and relocation, including species-specific equipment and best practice	Review AMP Rev 15 Sections 5.5.7–5.5.10 (salvage schedule, capture methods, holding, transport and	The AMP (Section 5.5) sets out detailed salvage and relocation methodologies,	AMP Rev 15 (LMDIP-05327-GNL-ENV-MPL-00002_15) / Rev 16 (LMDIP-05327-GNL-ENV-MPL-00002) Section	Compliant - The detailed salvage and relocation methodologies committed to in AMP Section 5.5 (capture,	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
	methods for each MNES species, must be implemented. [Audit: verify methods applied are consistent with AMP Rev 15 Section 5.5 commitments.]	release). Review actual species capture records and methodologies applied. Confirm consistency with DPI Fisheries guidelines (Appendix E). Confirm relevant permits were held (Section 14.1). Review salvage team qualifications.	capture methods (Section 5.5.8): boat electrofishing (7.5 GPP large / 3.5 GPP small units operated by SQPs), up to 20 fyke nets and seine netting on an as-needed basis for stranded fish. Holding methods (Section 5.5.9): a holding area with aerated, shaded 2,000 L storage tubs, threatened species housed separately, holding capacity per the DPI Fish Salvage Guidelines, and defined maximum capture-to-release timeframes; transport and release methods (Section 5.5.10): purpose-built aerated transport trailers releasing fauna at predetermined locations per the DPI Fish Salvage Guidelines. Species-specific measures are specified (e.g. recording length/weight/health for Mary River Cod and Australian Lungfish only, keeping the fyke-net cod-end afloat to avoid harm to air-breathing animals such as platypus). Electrofishing is to be undertaken in accordance with the Australian Code of Electrofishing Practice and Queensland General Fisheries Permit requirements, with drivers trained to senior operator statuspest fish are euthanised using ethics-committee-approved methods. The methods applied in the field, recorded in the Fishology quarterly monitoring reports, are consistent with these commitments: boat and backpack electrofishing, large-mesh fyke nets (a fyke-net boat with 20 nets), seine netting for stranded fish, aerated live-wells and a	5.5 (AFSRMP), Sections 5.5.7 (Salvage Schedule and Resourcing), 5.5.8 (Capture Methods), 5.5.9 (Holding Methods) and 5.5.10 (Transport and Release Methods), and Section 14 (permits and qualifications), DPI/DAF Guidelines for Fish Salvage (2018), Fishology Consulting Lake Macdonald Quarterly Monitoring Reports 1, 2 and 3 (Fish Salvage sections, methods and summary tables).	holding, transport and release, including species-specific equipment and best-practice measures) have been sighted, and the methods applied in the field, as recorded in the Fishology quarterly monitoring reports, are consistent with those commitments. Salvage was undertaken in accordance with the Australian Code of Electrofishing Practice, the Queensland General Fisheries Permit and the DPI Fish Salvage Guidelines, with species-specific handling, separate housing of threatened species, and euthanasia of pest fish under permit.	

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			fish management/holding area, purpose-built transport trailers, species-specific handling and relocation, and euthanasia of pest fish under fisheries-permit conditions. Fish were released in good condition and no threatened fish or turtles were harmed. Salvage operations were undertaken in accordance with the Queensland General Fisheries Permit and the DPI/DAF Guidelines for Fish Salvage (2018), with pest-fish euthanasia carried out under fisheries-permit conditions.			
9.d.i	Surveys to assess the suitability and carrying capacity of all proposed relocation sites must be conducted prior to lake drawdown.	Review AMP Rev 15 Section 5.5.6 and Appendix H. Confirm surveys were undertaken at all proposed relocation sites prior to drawdown commencement. Review survey methodology and findings for each site. Confirm any additional sites required were assessed prior to use.	The AMP (Section 5.5.6 and Appendix H) records that a suitability and carrying-capacity assessment of all proposed relocation sites was undertaken in December 2019 / January 2020 by Freshwater Ecology, in accordance with the EPBC approval. The assessment evaluated 38 potential sites against 12 assessment criteria, short-listed 18 sites for detailed assessment (travel times, habitat and water quality, macrophyte and macroinvertebrate abundance, fish and turtle surveys, platypus, food resources and carrying capacity), and selected the final relocation sites: 4 Mary River and 2 Yabba Creek sites for threatened species, and Cooloolabin Dam for other large-bodied fish (Table 5-5). This was completed prior to the commencement of lake drawdown (May 2025). Consistent with the AMP's further commitment (Section 5.5.6, all relocation sites to be revisited prior to any fauna being relocated;	AMP Rev 15 (LMDIP-05327-GNL-ENV-MPL-00002_15) / Rev 16 (LMDIP-05327-GNL-ENV-MPL-00002) Section 5.5.6 (Assessment of relocation sites and carrying capacity), Table 5-5 (selected relocation sites) and Appendix H (Relocation Site Assessment Report, incorporating Freshwater Ecology 2020); Fishology Consulting Lake Macdonald Quarterly Monitoring Report 1, Sections 5.2.3 and 5.3.1 and Tables 5.1–5.2; SMEC pre-relocation site inspection (16 April 2025).	Compliant - A survey to assess the suitability and carrying capacity of all proposed relocation sites was conducted prior to lake drawdown: the Freshwater Ecology (2020) assessment (December 2019 / January 2020) completed before drawdown commenced in May 2025. Consistent with the AMP's additional commitment to re-survey sites prior to relocation, the sites were re-inspected by SMEC (16 April 2025) and re-surveyed by Fishology (7 June 2025).	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			Appendix H: sites to be re-surveyed prior to the commencement of relocation to ensure continued viability), the sites were re-surveyed before relocation. A pre-relocation site inspection by SMEC on 16 April 2025, and a detailed visual relocation-site assessment by Fishology on 7 June 2025 (assessing access, water quality, habitat volume, microhabitat, macrophytes, streamflow and carrying capacity for each candidate site, Tables 5.1 and 5.2), completed prior to the first relocation activity on 23 June 2025. One site (site 37) was excluded as it was on private property, and primary Mary River Cod relocation sites were selected.			
9.d.ii	Monthly monitoring at all relocation sites for 12 months after week 4 of the drawdown schedule must be conducted to assess long-term success of salvage and relocation.	Review AMP Rev 15 Section 5.5.11. Confirm monthly monitoring at relocation sites commenced from week 4 of drawdown. Review monitoring records, species detection data, and survey reports for each relocation site. Assess adequacy of monitoring frequency and methodology.	Monthly monitoring at the Cooloolabin Dam relocation site was conducted (Seqwater rangers undertaking monthly visual inspections and WQ monitoring, consistently within acceptable parameters). REP-00003 confirms that, since more than 6 months had lapsed since the July 2025 translocation, LMDIP monitoring of Cooloolabin Dam ceased in January 2026, with Seqwater rangers continuing their own monthly inspections. As the AMP requirement runs 12 months (from week 4 of drawdown, to approximately July 2026), LMDIP's dedicated monitoring appears to stop several months short of that mark. AMP Rev 16 Section 5.5.11 requires, on a monthly basis at all relocation sites for 12 months after week four of the drawdown schedule, visual monitoring	LMDIP-10000-GNL-ENV-REP-00003 (Rev 1, 20/03/2026) Table 3; AMP Rev 16 (LMDIP-05327-GNL-ENV-MPL-00002, 1 May 2026), Section 5.5.11 (Monitoring of Relocation Success); 2026_Cooloolabin_data (Seqwater LIMS export, sampled dates Jan–Jul 2026) - dissolved oxygen and water-quality profiles, Cooloolabin Dam Mid-Lake / North West Arm / Offtake; Seqwater Waterway and Embankment Inspection records, Cooloolabin — 16/02/2026, 05/03/2026, 15/04/2026, 12/05/2026, 08/06/2026, 01/07/2026; LMDIP dedicated relocation-site monitoring records to January 2026.	Compliant - Monthly monitoring of the Cooloolabin Dam relocation site is evidenced across the full 12-month post-drawdown window. AMP Section 5.5.11 defines the monthly relocation-site monitoring as visual monitoring of the sites for mortality and measurement of in situ water quality focusing on dissolved oxygen (the six-monthly PIT-tag survivorship surveys are a separate element). LMDIP's dedicated monitoring covered the site from relocation through to January 2026; from January 2026 the monitoring continued through Seqwater's routine catchment program and ranger inspections. In situ dissolved oxygen was recorded monthly at the relocation site from January to July 2026, as full depth profiles across the Mid-Lake, North West Arm and Offtake locations, and monthly visual site inspections were undertaken (February to July 2026),	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			of the sites (observations of mortality) and measurement of in situ water quality focusing on dissolved oxygen. LMDIP's dedicated monitoring at the Cooloolabin Dam relocation site ran from relocation to January 2026. For the remainder of the period, Seqwater catchment water-quality monitoring was conducted at Cooloolabin Dam, recording in situ dissolved oxygen, monthly from January to July 2026, as full depth profiles at the Mid-Lake, North West Arm and Offtake sites, along with temperature, pH, turbidity and nutrients; and Seqwater ranger "Waterway (Lake/River/Creek) and Embankment Inspection" records documenting monthly on-water and shoreline inspection of the site (including visual checks for animal carcasses, debris, aquatic weeds and bank condition), with no matters of concern recorded. Drawdown week four was approximately late June 2025, placing the 12-month window at approximately late June 2025 to late June 2026, which the combined records cover month to month.		with no matters of concern recorded. Combined, these records cover the 12-month period from week four of the drawdown schedule.	
9.d.iii	Monthly monitoring at Lake Macdonald for 12 months from the final date of salvage and relocation back into Lake Macdonald (Mary River Cod only) to assess long-term success.	Review AMP Rev 15 Section 5.5.11 and Section 9.2. Note AMP Rev 15 records that all Mary River Cod will be permanently relocated (not temporarily held), which affects the trigger for this condition. Confirm DCCEEW has been informed of this approach. Review any monitoring of Lake Macdonald fish populations during construction. Confirm the	One Mary River Cod was captured during the July 2025 salvage and released at Traveston Crossing (site 12) in the Mary River. AMP Section 5.5.4.2.1 sets out a permanent-relocation strategy for all cod ("there will be no temporary relocation of Mary River cod; all cod will be relocated to suitable sites"), with the relocation sites listed at Tables 5-4 and 5-7 (four Mary River / two Yabba Creek sites). As	AMP Rev 15 / Rev 16, Section 5.5.4.2.1, Tables 5-4 and 5-7 (relocation sites); John Holland Quarterly Compliance and Monitoring Summary Report (7225-JHG-REP-SQ-001, Rev 1, 16/09/2025), Section 5.4.2 and Table 6; DAF cod relocation notification	Compliant - the single Mary River Cod salvaged in July 2025 was permanently relocated to Traveston Crossing under the AMP's approved permanent-relocation approach (5.5.4.2.1). As the cod was not held for temporary relocation, the long-term-holding trigger this condition contemplates is not applicable. The permanent approach is included in the DAF/DCCEEW-reviewed AMP.	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
		approach to this condition is documented and agreed.	the cod was permanently relocated rather than held, the 12-month post-return monitoring trigger this condition contemplates (temporary holding, then release back into Lake Macdonald and monitoring for long-term success) is not triggered.			
Condition 10 - During salvage and relocation the approval holder must ensure: a) only specified species relocated; b) Department notified within 3 business days of Mary River Turtle or White-throated Snapping Turtle being identified; c) no cod/lungfish to Tinana/Obi Obi Creeks; d) only Mary River Cod temporarily relocated; e) temporary cod relocation only to approved sites; f) no lungfish to farm dams.						
10.a	No protected matter(s) other than Australian Lungfish, Mary River Cod, Mary River Turtle, and White-throated Snapping Turtle must be relocated.	Review AMP Rev 15 Table 52 and Section 5.5.2. Review species capture logs, salvage records, and relocation manifests to confirm only the four specified MNES species were captured and relocated.	Condition 10.a permits relocation of only four MNES species (Australian Lungfish, Mary River Cod, Mary River Turtle, White-throated Snapping Turtle); no other protected matter, including the Giant Barred Frog, the fifth listed MNES, may be relocated. The AMP (Section 5.5.2 and Table 5-2) records the same, and provides that frogs are not targeted during salvage. The salvage and relocation events within the re-cast audit period are documented as follows: the main drawdown salvage (7–11 July 2025; Fishology Report 1, Table 5.3) relocated a total of 638 fish, Australian bass (253), freshwater/eeltail catfish (229) and long-finned eel (155), all non-protected, plus a single Mary River Cod (a permitted species), which was measured, fin-clipped (genetics sample to Griffith University), PIT-tagged and released at Traveston Crossing (site 12) in the Mary River in accordance with the AMP. Non-target pest species (129 banded grunter and one saratoga) were euthanised, not relocated. The 14 October 2025 spillway-pool salvage (Fishology Report 2) recorded	AMP Rev 15 (LMDIP-05327-GNL-ENV-MPL-00002_15) / Rev 16 (LMDIP-05327-GNL-ENV-MPL-00002) Section 5.5.2 and Table 5-2; Fishology Consulting Lake Macdonald Quarterly Monitoring Report 1 (Section 5.5.3 and Table 5.3, fish relocated) and Report 2 (Section 6, fish salvage); John Holland Quarterly Compliance and Monitoring Summary Report (7225-JHG-REP-SQ-001, 16 September 2025); LMDIP-10000-GNL-ENV-REP-00002 (Rev 2, 15 January 2026). Queensland General Fisheries Permit number 254464; Animal ethics approval CA 2023-10-1785.	Compliant - Only permitted species were relocated during the audit period. Across the salvage and relocation events within the re-cast audit period (the July 2025 drawdown salvage and the 14 October 2025 spillway-pool salvage), the only MNES species relocated was a single Mary River Cod, released at Traveston Crossing; the remaining relocated fauna were non-protected fish (Australian bass, catfish and long-finned eel), and pest species were euthanised rather than relocated.	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			no threatened fish or turtles captured or observed. No Australian Lungfish, Mary River Turtle, White-throated Snapping Turtle or Giant Barred Frog was relocated during the audit period. The Giant Barred Frog was addressed through habitat assessment only (Six Mile Creek frog-habitat surveys), consistent with the AMP.			
10.b	DCCEEW must be notified within 3 business days if any Mary River Turtle or White-throated Snapping Turtle are identified during salvage and relocation operations.	Review salvage species capture records for detections of Mary River Turtle or White-throated Snapping Turtle. Review DCCEEW notification correspondence. Confirm any required notifications were sent within 3 business days of detection. Review AMP Rev 15 Section 5.5.12 reporting commitments.	Fauna monitoring records for the audit period record only three turtle species: - Krefftt's river turtle (<i>Emydura macquarii krefftii</i>), - Broad-shelled river turtle (<i>Chelodina expansa</i>) and - Saw-shelled turtle (<i>Wollumbinia latisternum</i>) Expressly state that no threatened turtle species were recorded during the survey. No Mary River Turtle (<i>Elusor macrurus</i>) or White-throated Snapping Turtle (<i>Elseya albagula</i>) is recorded in the salvage/relocation or turtle-monitoring records reviewed.	LMDIP Quarterly Compliance and Monitoring Report (LMDIP-10000-GNL-ENV-REP-00003, Rev 1, 20/03/2026), Section 3.3 (Turtle monitoring) and turtle species catch table; LMDIP-10000-GNL-ENV-REP-00002 (Rev 2, 15/01/2026) fauna records.	Compliant - No Mary River Turtle or White-throated Snapping Turtle was identified in the fauna records reviewed (which record only non-threatened turtle species and expressly note that no threatened turtle species were recorded). The requirement to notify DCCEEW within 3 business days was therefore not triggered during the audit period reviewed. (Verified against the quarterly turtle-monitoring records; to be confirmed across any remaining reporting periods for the full audit period.)	Y
10.c	No Mary River Cod or Australian Lungfish must be relocated to Tinana Creek or Obi Obi Creek.	Review AMP Rev 15 Table 55 (relocation sites) and species transport logs/relocation manifests. Confirm all cod and lungfish relocation destinations exclude the Tinana Creek and Obi Obi Creek sub-catchments.	The AMP states "No aquatic fauna will be relocated to the Tinana Creek or Obi Obi Creek sub-catchments," and the AFSRMP repeats the commitment. The commitment is broader than the condition, extending the exclusion to all aquatic fauna. The relocation sites assessed and selected (Freshwater Ecology 2020 assessment; AMP Table 5-5) and those used in the field are Cooloolabin Dam (South Maroochy River catchment), Traveston Crossing (site 12), Tuchekoi Road (site 17), Moy Pocket Road (site 33), Kandanga-Imbil Road (site 18) and	AMP Rev 15 (LMDIP-05327-GNL-ENV-MPL-00002_15) / Rev 16 (LMDIP-05327-GNL-ENV-MPL-00002), Condition 10(c) compliance mapping, Section 5.5 (AFSRMP) and Table 5-5 (relocation sites); Fishology Consulting Lake Macdonald Quarterly Monitoring Report 1, Sections 5.3.1 and 5.5.3, Tables 5.1–5.3 (relocation sites and fish relocated), and Reports 2 and 3.	Compliant - No Mary River Cod or Australian Lungfish was relocated to Tinana Creek or Obi Obi Creek. The AMP contains an express commitment excluding relocation of aquatic fauna to those sub-catchments, and the relocation sites assessed and used (Cooloolabin Dam, Traveston Crossing, Tuchekoi Road, Moy Pocket Road, Kandanga-Imbil Road, Derrier Road and Yabba Creek sites) lie outside both. The single Mary River Cod relocated during the audit period was released at Traveston Crossing in	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			Derrier Road (site 31) on the Mary River and its tributaries, together with Yabba Creek sites for threatened species. None of these sites is within the Tinana Creek or Obi Obi Creek sub-catchments. The only Mary River Cod relocated during the audit period was released at Traveston Crossing (site 12) in the Mary River. No Australian Lungfish was relocated during the audit period. The lungfish recorded were released at the point of capture or observed only. No reference to relocation to Tinana Creek or Obi Obi Creek appears in the Fishology quarterly monitoring reports.		the Mary River, and no Australian Lungfish was relocated.	
10.d	Mary River Cod is the only species that may be temporarily relocated. All other protected matter(s) including Australian Lungfish must be permanently relocated.	Review relocation records for all MNES species. Confirm all species other than Mary River Cod were permanently relocated. Note AMP Rev 15 documents that all Mary River Cod are also being permanently relocated, confirm this approach and any implications for this condition are documented with DCCEEW.	One Mary River Cod was captured in July 2025 and handled under a permanent relocation strategy (AMP Section 5.5.4.2.1). The AMP lists the capture date as both 8 and 9 July 2025.	AMP Rev 15 / Rev 16 Section 5.5.4.2.1; John Holland Quarterly Compliance and Monitoring Summary Report (7225-JHG-REP-SQ-001, Rev 1, 16/09/2025) Section 5.4.2 and Table 6.	Compliant - Condition 10(d) is permissive. The Mary River Cod the only species that may be temporarily relocated and requires all other protected matter to be permanently relocated. It does not require the cod to be temporarily relocated. Electing to permanently relocate the single salvaged cod (per the approved AMP §5.5.4.2.1) is therefore permitted, and all other protected matter was permanently relocated.	Y
10.e	Temporary relocation of Mary River Cod can only be to the Gerry Cook Fish Hatchery or another location approved by DAF prior to commencement of lake drawdown.	No temporary relocation of Mary River Cod occurred during the audit period. The AMP commits that "There will be no temporary relocation of Mary River cod, all cod will be relocated to suitable sites," and the single cod captured during the July 2025 salvage was measured, fin-clipped, PIT-tagged and immediately released at Traveston Crossing (site 12) in the Mary River. The AMP records that, in discussion with DAF and relevant state government experts, "the temporary	One Mary River Cod was captured in July 2025 and released at Traveston Crossing in the Mary River (a permanent relocation). The AMP lists the capture date as both 8 and 9 July 2025.	AMP Rev 15 (LMDIP-05327-GNL-ENV-MPL-00002_15) / Rev 16 (LMDIP-05327-GNL-ENV-MPL-00002), Condition 10(e) compliance mapping, Section 5.5 (AFSRMP), Table 5-5 (relocation sites) and Appendix H (relocation site assessment, DAF and state expert consultation); Fishology Consulting Lake Macdonald Quarterly Monitoring Report 1, Section 5.5.3 and Table 5.3; John Holland Quarterly Compliance and Monitoring	Compliant - No temporary relocation occurred; the cod was permanently relocated to Traveston Crossing, an assessed site under the AMP. The condition is therefore not engaged and the Gerry Cook / DAF-prior-approval constraint does not apply.	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
		relocation of Mary River Cod to a private hatchery that is currently performing the role that Gerry Cook hatchery performed in breeding fish for conservation and recreational stocking purposes has been approved." The relocation destination used (Traveston Crossing, Mary River) differs from the Gerry Cook Fish Hatchery named in the condition. On the approval holder's approach this is a permanent relocation to an assessed site rather than a temporary relocation to a holding facility.		Summary Report (7225-JHG-REP-SQ-001, 16 September 2025).		
10.f	No Australian Lungfish must be relocated to farm dams.	Review AMP Rev 15 Table 55. Confirm all listed relocation sites for Australian Lungfish exclude farm dams. Review relocation records and transport logs to confirm compliance.	No Australian Lungfish were relocated to farm dams. Three lungfish interactions were recorded (two downstream, one in the lake). The two downstream individuals were moved downstream by the ecologist, and the lungfish encountered during salvage was released at its capture location rather than relocated.	LMDIP-10000-GNL-ENV-REP-00003 (Rev 1, 20/03/2026) Section 3.1.3 and Table 13.	Compliant - No Australian Lungfish were relocated to farm dams; lungfish interactions were released locally/downstream rather than relocated.	Y
Residual Significant Impacts (Conditions 11–13)						
Condition 11–13 - Conditions 11–13: Significant Impact Assessment (within 6 months of monitoring completion), public availability (within 9 months), and Offset Plan (if directed by Minister). These are future obligations contingent on completion of monitoring under conditions 5 and 9.						
11	Significant Impact Assessment within 6 months of completion of monitoring under conditions 5 and 9.	Confirmed as Not Applicable, See Appendix B register.	See Appendix B.	See Appendix B.	Future obligation not yet triggered. Monitoring under conditions 5 and 9 is ongoing. Estimated to be triggered post-2030. To be addressed in a future audit period.	NA
12	SIA and independent review to be publicly available within 9 months of monitoring completion and provided to the Minister within 5 business days of publication.	Confirmed as Not Applicable, See Appendix B register.	See Appendix B.	See Appendix B.	Future obligation contingent on completion of condition 11. Not triggered in this audit period.	NA

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
13	Submission of Offset Plan if the Minister determines residual significant impacts exist.	Confirmed as Not Applicable, See Appendix B register.	See Appendix B.	See Appendix B.	Contingent future obligation dependent on the outcome of the condition 11 SIA. Not triggered in this audit period.	NA
PART B – STANDARD ADMINISTRATIVE CONDITIONS						
Commencement and Records (Conditions 14–17)						
Condition 14–15 - Condition 14: Written notification of commencement date within 10 business days. Condition 15: Action must commence within 5 years of approval (by 7 November 2024).						
14	Written notification of commencement date to be provided within 10 business days of commencement.	Review records relating to the commencement of the action, including construction records, contractor mobilisation records, Office of the Coordinator-General approvals, and correspondence provided to DCCEEW. Confirm the commencement date relied upon by the approval holder and assess whether written notification was provided to DCCEEW within 10 business days of commencement.	Commencement of the action is taken (see Condition 15) to have occurred on 6 November 2024, per the contemporaneous notification. Condition 14 requires written notification of the commencement date within 10 business days. Seqwater notification ref D24/283386 (dated and sent 7 November 2024, Olivia Newman) notified DCCEEW that early works commenced on 6 November 2024 with mobilisation of plant to site - i.e. notified the following day, well within 10 business days. The core notification-timing obligation was therefore met. However, the notification record is internally inconsistent. Seqwater subsequently issued a second commencement notification (ref D25/103857, 30 May 2025, Richard Plowes) stating commencement occurred on 26 May 2025 (aligned to lake drawdown), and later self-reported under Condition 21 (3 July 2026, Nathan Carruthers) that commencement had in fact occurred on 13 November 2024, describing the 30 May 2025 notification as an administrative oversight. The approval holder proceeded on the basis that 26 May 2025 was the official commencement, which caused the Condition 20 reporting and Condition	Seqwater commencement notification ref D24/283386, 7 November 2024 (Olivia Newman, General Manager - Capital Delivery) - DCCEEW_Commencement_notification.pdf; Seqwater commencement notification ref D25/103857, 30 May 2025 (Richard Plowes, Project Director) - D25103857_..._Notification_of_commencement_of_the_action.pdf; Seqwater Condition 21 self-report email, 3 July 2026 (Nathan Carruthers) - within FW_EPBC_20178078__Compliance_Report_and_Independent_Audit.pdf; EPBC 2017/8078 Approval decision (7 November 2019); Variation of Conditions (10 August 2020).	Compliant - Commencement of the action occurred on 6 November 2024 and was notified by letter dated 7 November 2024, within the 10-business-day requirement, satisfying Condition 14. The commencement record is, however, internally inconsistent. Seqwater issued a second, conflicting notification on 30 May 2025 (citing 26 May 2025, aligned to lake drawdown), and the Condition 21 self-report (3 July 2026) cited a further date of 13 November 2024. This duplicate and inconsistent notification record does not detract from compliance with Condition 14, but the resulting misalignment of the Condition 20 reporting and Condition 23 audit cycles is assessed separately and rated Non-Compliant against those conditions.	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			23 audit cycles to be structured to the wrong date.			
15	If commencement has not occurred within 5 years of the approval date, prior written Ministerial agreement is required.	Review records establishing the commencement date of the action, including early works records, vegetation clearing records, construction records, contractor documentation, and relevant approvals and correspondence. Assess whether commencement occurred within 5 years of the approval date or, where applicable, whether prior written agreement from the Minister was obtained in accordance with Condition 15.	The EPBC 2017/8078 approval issued 7 November 2019, so the Condition 15 five-year commencement window closed on 7 November 2024. The earliest and contemporaneous record of commencement is Seqwater notification ref D24/283386 (dated and sent 7 November 2024, Olivia Newman, General Manager - Capital Delivery, to DCCEEW Post Approvals), which records that early works commenced on 6 November 2024 with mobilisation of plant to site, one day before the deadline, and therefore within the five-year window. The commencement record is not internally consistent. Seqwater subsequently issued a second notification (ref D25/103857, 30 May 2025, Richard Plowes, Project Director) stating that commencement occurred on 26 May 2025 (aligned to lake drawdown), and a later Condition 21 self-report (Nathan Carruthers, 3 July 2026) cited a third date, 13 November 2024 (site establishment / early works), describing the 30 May 2025 notification as an administrative oversight. The 10 August 2020 Variation of Conditions did not amend Condition 15 or the approval date. No prior written Ministerial agreement to a later commencement has been sighted (and, on the accepted commencement date, none was required).	Seqwater commencement notification ref D24/283386, 7 November 2024 (Olivia Newman, General Manager - Capital Delivery) - DCCEEW__Commencement_notification.pdf; Seqwater commencement notification ref D25/103857, 30 May 2025 (Richard Plowes, Project Director) - D25103857...Notification_of_commencement_of_the_action.pdf; Seqwater Condition 21 self-report email, 3 July 2026 (Nathan Carruthers) - within FW_EPBC_20178078__Compliance_Reporting_and_Independent_Audit.pdf; EPBC 2017/8078 Approval decision (7 November 2019); Variation of Conditions (10 August 2020).	Compliant - On the contemporaneous record (notification D24/283386, 7 November 2024), commencement of the action occurred on 6 November 2024 with mobilisation of plant to site, within the five-year window (closing 7 November 2024). On that basis Condition 15 is satisfied and no prior written Ministerial agreement was required. This finding is expressly qualified by a documented inconsistency in the approval holder's commencement records (see also Conditions 14, 20 and 23-24). Seqwater issued two further, conflicting commencement records: 1. a second notification on 30 May 2025 citing 26 May 2025, 2. a Condition 21 self-report on 3 July 2026 citing 13 November 2024. The reporting and audit cycles were then based on the 26 May 2025 date. Adopting the earliest contemporaneous date (6 November 2024) resolves Condition 15 in the approval holder's favour; however, had either later date (13 November 2024 or 26 May 2025) been accepted as the operative commencement, the action would have commenced outside the five-year window without the prior written Ministerial agreement that Condition 15 would then require. The auditor recommends the approval holder formally confirm 6 November 2024 as the commencement date with DCCEEW to place the matter beyond doubt.	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
Condition 16–17 - Condition 16: Maintain accurate and complete compliance records. Condition 17: Provide electronic copies of records to the Department on written request.						
16	Accurate and complete compliance records must be maintained.	Review the compliance record management system and records held by the approval holder. Assess completeness, accuracy and accessibility of records across all condition areas. Interview approval holder staff responsible for compliance records management.	A suite of current, structured environmental compliance registers is maintained for the project, including the Master Water Quality Register (multiple monitoring locations, Jan 2025 - Jul 2026), the siphon operations log (daily records 30 May 2025 - 13 Jul 2026), and the Fish Net Monitoring Inspection Record. Records are dated, attributed to personnel and organised by location/parameter. Further evidenced by the quarterly compliance reports, which together provide a structured compliance-recording framework: a monitoring-obligation compliance table (Table 3), an incident register (Tables 4/8), a complaints register (Table 5), a corrective-actions register (Section 4), and dated monitoring datasets across water quality, fish, turtle, habitat, noise, vibration and dust.	01. Master Water Quality Register.xlsx; Lowering siphon ops.xlsx; Fish Net Monitoring Inspection Record.xlsx. LMDIP-10000-GNL-ENV-REP-00002 (Rev 2, 15/01/2026) and the preceding JHG report 7225-JHG-REP-SQ-001.	Compliant - Accurate and complete compliance records are being maintained across the environmental monitoring streams, evidenced by the current, dated and attributed registers provided.	Y
17	Electronic copies of compliance records must be provided to the Department within the timeframe specified in any written request.	Review DCCEEW correspondence for any written requests for compliance records during the audit period. Confirm records were provided within the specified timeframes. Note as NA if no request has been made in this period.	Condition 17 is triggered only where the Department makes a written request for electronic copies of compliance records. A review of the DCCEEW correspondence provided for the audit identified no written request from the Department for compliance records during the re-cast audit period (6 November 2024 to 31 May 2026). Correspondence with DCCEEW within the audit period comprised the approval of the revised Adaptive Management Plan Rev 14 (7 May 2025) and the Department's confirmation, by email of 14 August 2025 (Alice Shields), that the Rev 15 submission adequately addressed approval conditions 27 and 28 and that no	DCCEEW letter approving the revised Adaptive Management Plan (Rev 14), 7 May 2025; DCCEEW email (Alice Shields), 'RAMP Six Mile Creek Dam Safety Upgrade (2017/8078)', 14 August 2025; DCCEEW/Seqwater/John Holland correspondence chain, 'EPBC 2017/8078 – Compliance Reporting and Independent Audit – amendment to draft audit criteria' [SEC=OFFICIAL], 24 February 2026 to 17 May 2026.	NA – Not Triggered	NA

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			further information was required. Neither constitutes a request for compliance records under Condition 17. Requests for information were identified in DCCEEW correspondence dated February to May 2026, specifically, a request for an updated auditor curriculum vitae detailing environmental audit experience, and a request for updated draft audit criteria addressing The approval holder maintains compliance records in the Soteria system and across the environmental registers and reports reviewed under Condition 16.			
Publication and Reporting (Conditions 18–22)						
Condition 18 - The approval holder must: a) submit plans electronically to the Department; b) publish approved plans on the website within 10 business days; c) exclude/redact sensitive ecological data; d) keep plans published until 30 June 2035.						
18.a	Plans must be submitted electronically to the Department for Ministerial approval.	Confirmed as Not Applicable, See Appendix B register.	See Appendix B.	See Appendix B.	Pre-commencement administrative action. AMP Rev 15 submitted to and approved by DCCEEW. Confirmed complete. No ongoing obligation for condition 18(a) in this audit period.	NA
18.b	Each approved plan must be published on the website within 10 business days of the date the plan is approved by the Minister (or revised plan submitted).	Review DCCEEW approval letters for the AMP and all revisions. Compare approval dates against the approval holder's (Seqwater) website publication dates. Confirm all plans (including AMP Rev 15) were published within 10 business days. Confirm publication dates for all revisions submitted during the audit period.	A desktop review of the approval holder's website (https://www.seqwater.com.au/project/lake-macdonald-dam-improvement-project) was undertaken to verify publication of the approved plans. The Adaptive Management Plan is published and publicly accessible. The version currently linked from the project page is Rev 16 (dated 1 May 2026), hosted at a file path indicating an upload month of June 2026. The superseded Rev 15 (dated 18 August 2025) also remains accessible, at a file	Seqwater project webpage, Lake Macdonald Dam Improvement Project (https://www.seqwater.com.au/project/lake-macdonald-dam-improvement-project); Published Adaptive Management Plan Rev 16 (dated 1 May 2026) and Rev 15 (dated 18 August 2025) as hosted on the Seqwater website; DCCEEW letter approving the revised Adaptive Management Plan Rev 14, 7 May 2025;	Compliant - The approved Adaptive Management Plan is published on the approval holder's website and is publicly accessible.	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			path indicating an upload month of August 2025. No publication date is displayed on the website for any published plan. The date segments within the file paths indicate the upload month only and are not conclusive evidence of the date on which each plan was published. Within the audit period, two publication triggers arose under this condition: 1. the Ministerial approval of AMP Rev 14 on 7 May 2025, 2. The submission of the self-revised AMP Rev 15 (submitted 1 August 2025, implemented 14 August 2025). Rev 15 appears from its file path to have been published in August 2025. AMP Rev 14 was not identified on the website at the date of review; it appears to have been superseded by Rev 15 in August 2025. AMP Rev 16 was submitted to DCCEEW on 7 May 2026 and appears from its file path to have been published in June 2026. The website also publishes the Site Environmental Management Plan and its associated construction environmental sub-plans.	DCCEEW email confirming Conditions 27 and 28 adequately addressed for the Rev 15 submission, 14 August 2025; Seqwater letter submitting the RAMP under Conditions 27 and 28 (Ref D26/83705), 7 May 2026.		
18.c	Sensitive ecological data must be excluded or redacted from plans published on the website.	Review published versions of the AMP and AFSRMP on the Seqwater website. Confirm sensitive ecological data (as defined in the Sensitive Ecological Data Policy V1.0) has been excluded or redacted from publicly available versions.	The desktop review of the approval holder's website confirmed that the published Adaptive Management Plan versions (Rev 16, dated 1 May 2026, and the superseded Rev 15, dated 18 August 2025) are complete documents, published in full including all appendices.	Seqwater project webpage, Lake Macdonald Dam Improvement Project, reviewed July 2026; published Adaptive Management Plan Rev 16 (1 May 2026) and Rev 15 (18 August 2025) as hosted on the Seqwater website, including Appendices F, G, H and I and Tables 3-	Compliant - The approved Adaptive Management Plan is published in full, including appendices with ecological survey data, habitat assessment and mapping, monitoring site locations and coordinates, and relocation-site assessment information for protected matters.	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			The published plans contain ecological information relating to the protected matters, including: the identification of the five MNES species known or potentially occurring in Lake Macdonald and Six Mile Creek; habitat assessment and mapping; the Relocation Site Assessment Report (Appendix H), which identifies assessed and selected fauna relocation sites; the biomass survey (Appendix I); habitat monitoring program details and monitoring site locations (Appendix F); and water quality monitoring site coordinates (Table 3-1). The plans also identify the named relocation sites for MNES species (Table 5-5 / Table 5-4). No indication of exclusion or redaction of sensitive ecological data was evident in the published versions. Related project documents are also publicly available through Queensland Government channels, including the Coordinator-General's evaluation report and the Coordinator-General's report on project change, and an earlier draft of the Adaptive Management Plan published as an appendix to the draft Impact Assessment Report on the Queensland EIS document portal. Seqwater has also published an Ecological Management fact sheet (January 2025) identifying the MNES species and describing the relocation site types in general terms. These are	1 and 5-5; Seqwater Ecological Management fact sheet (January 2025); Coordinator-General's evaluation report on the Impact Assessment Report (May 2019) and Coordinator-General's report on project change (Queensland Government websites); draft Adaptive Management Plan published as Appendix C to the draft Impact Assessment Report (Queensland EIS document portal).	No exclusions or redactions of sensitive ecological data were evident in the published versions. The auditor has not found that sensitive ecological data was improperly disclosed, noting that comparable ecological information is already publicly available through Queensland Government approval documents.	

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			separate publications and do not form part of the approval holder's obligation under Condition 18, but indicate that comparable ecological information is already in the public domain.			
18.d	Plans must be kept published on the approval holder's website until 30 June 2035.	Review the Seqwater website to confirm all approved plans (AMP Rev 15 and any prior approved versions) are currently accessible and have not been removed since publication. This is an ongoing obligation active throughout the approval period.	The desktop review of the approval holder's website confirmed that the approved Adaptive Management Plan remains published and publicly accessible on the Lake Macdonald Dam Improvement Project page. The current approved instrument, AMP Rev 16 (dated 1 May 2026), is published and linked from the project page under the Site Environmental Management Plan sub-plan listing. The superseded AMP Rev 15 (dated 18 August 2025) also remains accessible at its published file location, although it is no longer linked from the project page. Both documents were accessible and opened in full, including appendices, at the date of the auditor's review. The approval holder also maintains publication of the Site Environmental Management Plan and its associated construction environmental sub-plans on the same page. AMP Rev 14, approved by the Minister on 7 May 2025, was not identified on the website at the date of review (see also Condition 18.b). No evidence was identified of any approved plan having been removed from the website following publication, other than the Rev 14 position noted above.	Seqwater project webpage, Lake Macdonald Dam Improvement Project (https://www.seqwater.com.au/project/lake-macdonald-dam-improvement-project), reviewed July 2026; published Adaptive Management Plan Rev 16 (dated 1 May 2026) and Rev 15 (dated 18 August 2025) as hosted on the Seqwater website.	Compliant - The approved Adaptive Management Plan remains published and publicly accessible on the approval holder's website. At the date of the review, the current approved instrument (Rev 16) was published and linked from the project page, and the superseded Rev 15 also remained accessible at its published location. No evidence was identified of any approved plan having been removed from the website following publication.	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
Condition 19 - Monitoring data, surveys, maps and spatial/metadata required under an approved plan must be prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to DCCEEW.						
19	Monitoring data, survey reports, maps and spatial/metadata must be prepared in accordance with DCCEEW biological survey and mapped data guidelines (2018) and submitted electronically.	Review monitoring data submissions, survey reports and shapefiles prepared under the AMP during the audit period. Confirm compliance with DCCEEW biological survey and mapped data guidelines for all submitted data. Review submission records to DCCEEW for monitoring datasets, clearing extents, and spatial disturbance information.	Monitoring data, survey reports and spatial data have been prepared under the approved plan during the audit period, including: - habitat assessment and mapping (AMP Appendix G, completed July 2020); - the habitat monitoring program and monitoring site locations and coordinates (AMP Appendix F, Table 3-1); the relocation site assessment (AMP Appendix H); - hydroacoustic bathymetry and shapefile data collected by Inforfish for Seqwater (AMP Appendix I biomass survey); - the Fishology Consulting quarterly monitoring reports; - fauna post-clearance reports; - and the clearing boundary overlay survey (drawing M5500 1014 050, Rev A, 27 May 2026, Minstaff Survey), prepared to MGA2020 Zone 56 and AHD datum. The AMP addresses data handling at Section 12, requiring all monitoring data, quality control documents and site photographs to be stored electronically in a suitable database with documentation, quality control and access control. Section 12 does not reference the Department's Biological Survey and Mapped Data Guidelines (2018), and no reference to those guidelines was identified elsewhere in the AMP.	AMP Rev 15 (LMDIP-05327-GNL-ENV-MPL-00002_15) / Rev 16 (LMDIP-05327-GNL-ENV-MPL-00002), Section 12 (Data Handling and Storage), Section 13 and Table 13-1 (EPBC reporting requirements), Appendices F, G, H and I, Table 3-1, and the glossary definition of "Compliance reports"; Clearing Boundary Overlay, drawing M5500 1014 050 Rev A (Minstaff Survey, 27 May 2026); Fishology Consulting Lake Macdonald Quarterly Monitoring Reports 1, 2 and 3; fauna post-clearance reports (601JH2405D); Department of the Environment and Energy, Biological Survey and Mapped Data Guidelines (2018).	Not Applicable - preparation and submission of monitoring and spatial data under the Biological Survey and Mapped Data Guidelines (2018) was not triggered within the audit period. Carried as a recommendation to confirm the 2018-Guidelines basis and the Condition 32 completion data.	NA

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			The AMP defines "Compliance reports" as including a shapefile of any clearance of any protected matter(s), or their habitat, undertaken within the relevant 12-month period. The annual compliance report is therefore the vehicle through which clearance shapefile data is provided to the Department. As the annual compliance report for the audit period has not been prepared or published (see Condition 20.a), that shapefile has not been submitted. No records were sighted evidencing the electronic submission to DCCEEW of monitoring data, survey reports, maps or spatial data and metadata prepared under the approved plan during the audit period.			
Condition 20 - Compliance reports must be prepared for each 12-month period: a) published within 60 business days; b) DCCEEW notified by email with weblink within 5 business days of publication; c) kept publicly available until expiry; d) sensitive data redacted; e) full report to DCCEEW within 5 business days where data excluded.						
20.a	Compliance report must be published on the website within 60 business days following each 12-month period.	Review published compliance reports on the Seqwater website. Confirm reports cover each 12-month period since commencement. Compare publication dates against the 12-month period end dates to verify the 60 business day requirement is met.	Condition 20 requires a compliance report for each 12-month period following commencement of the action, published within 60 business days of the period end. Commencement occurred on 6 November 2024 (see Conditions 14 and 15), so the first 12-month reporting period is 6 November 2024 - 5 November 2025. The approval holder structured its reporting cycle to the notified 26 May 2025 commencement date, so the first reporting period and its 60-business-day publication deadline are not aligned to the actual commencement. The approval holder self-reported the commencement/cycle-alignment issue to DCCEEW under Condition 21 (3 July 2026).	Seqwater commencement notification ref D24/283386, 7 November 2024 (Olivia Newman) - DCCEEW__Commencement_notification.pdf; Seqwater commencement notification ref D25/103857, 30 May 2025 (Richard Plowes) - D25103857_..._Notification_of_commencement_of_the_action.pdf; Seqwater Condition 21 self-report email, 3 July 2026 (Nathan Carruthers) - within FW_EPBC_20178078__Compliance_Reporting_and_Independent_Audit.pdf.	Non-compliant - The annual compliance-reporting cycle under Condition 20 has been keyed to the notified 26 May 2025 date rather than the actual commencement of the action (6 November 2024), so the first 12-month reporting period (6 November 2024 - 5 November 2025) and its publication deadline are misaligned. This is the same administrative error self-reported under Condition 21 (3 July 2026) and requires the reporting cycle to be realigned to 6 November 2024. Conditions 20.b-20.e (notification, ongoing availability and redaction) are consequential and remain to be verified against the corrected reporting cycle.	N

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
20.b	DCCEEW must be notified by email with the weblink within 5 business days of publication.	Review email notification records to DCCEEW. Confirm notifications include the compliance report weblink and were sent within 5 business days of each publication date.	Condition 20(b) requires DCCEEW to be notified by email, including the weblink, within 5 business days of publication of each annual compliance report. The obligation is contingent on publication having occurred. The desktop review of the approval holder's website identified quarterly compliance monitoring reports published for the project, but no annual compliance report for the audit period. Consistent with this, the approval holder advised during the audit that the annual compliance report has not yet been published. As no annual compliance report has been published, the 5-business-day notification obligation under Condition 20(b) has not yet been triggered. No DCCEEW notification email or weblink for an annual compliance report was sighted.	Seqwater Condition 21 self-report email, 3 July 2026 (within FW_EPBC_20178078__Compliance_Reporting_and_Independent_Audit.pdf); Seqwater website desktop review.	Not Applicable - DCCEEW notification with the weblink is not triggered until the outstanding annual compliance report is published.	NA
20.c	All compliance reports must be kept publicly available on the website until 30 June 2035.	Review the Seqwater website to confirm all published compliance reports remain accessible and none have been removed.	Condition 20(c) requires all compliance reports to be kept publicly available on the approval holder's website until 30 June 2035. The obligation is contingent on a compliance report having been published. The desktop review of the approval holder's website identified no annual compliance report published for the audit period. Consistent with this, the approval holder advised during the audit that the annual compliance report has not yet been published. Accordingly, there is no published annual compliance report to which the continued-availability obligation currently attaches.	Seqwater project webpage, Lake Macdonald Dam Improvement Project (https://www.seqwater.com.au/project/lake-macdonald-dam-improvement-project); published quarterly compliance and monitoring reports as listed on that page (August 2025 monitoring report; LMDIP-10000-GNL-ENV-REP-00003; March 2026 quarterly compliance monitoring report; LMDIP-10000-GNL-ENV-REP-00004).	Not Applicable - continued public availability is not triggered until the outstanding annual compliance report is published.	NA

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			The website does publish a series of quarterly compliance and monitoring reports for the project, including the August 2025 monitoring report, LMDIP-10000-GNL-ENV-REP-00003 (1 December 2025 to 28 February 2026), the March 2026 quarterly compliance monitoring report, and LMDIP-10000-GNL-ENV-REP-00004 (June 2026). These are project monitoring reports rather than the annual compliance reports required under Condition 20, but each was accessible during the review and none appeared to have been removed following publication.			
20.d	Sensitive ecological data must be excluded or redacted from publicly available compliance reports.	Review published compliance reports for appropriate exclusion or redaction of sensitive ecological data as defined in the Sensitive Ecological Data Policy V1.0.	Condition 20(d) requires sensitive ecological data to be excluded or redacted from publicly available compliance reports. The obligation applies to compliance reports that have been published. The desktop review of the approval holder's website identified no annual compliance report published for the audit period. Consistent with this, the approval holder advised during the audit that the annual compliance report has not yet been published. The quarterly compliance and monitoring reports published on the project page were reviewed as context. These reports contain ecological monitoring information, including species catch and relocation data, turtle and fish monitoring results and monitoring site references. They are project monitoring reports rather than the annual compliance reports required under Condition 20, and no assessment against the Sensitive	Seqwater project webpage, Lake Macdonald Dam Improvement Project; published quarterly compliance and monitoring reports as listed on that page; Sensitive Ecological Data Policy V1.0	Not Applicable - the sensitive ecological data (redaction) assessment is not triggered in the absence of a published annual compliance report to assess.	NA

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			Ecological Data Policy V1.0 was sighted in relation to them.			
20.e	Where sensitive data has been excluded, the full compliance report must be submitted to DCCEEW within 5 business days of publication.	Review submission records for full (unredacted) versions of compliance reports provided to DCCEEW. Confirm submissions were made within 5 business days of publication of each redacted version.	Where sensitive data has been excluded from a published compliance report, the full (unredacted) report must be submitted to DCCEEW within 5 business days. No relevant publication/exclusion event has been evidenced, so this obligation is not evidenced as triggered.	Seqwater Condition 21 self-report email, 3 July 2026 (within FW_EPBC_20178078__Compliance_Report_and_Independent_Audit.pdf); Seqwater website - desktop review.	Not Applicable - provision of the full unredacted report to DCCEEW is not triggered until the annual compliance report is published	NA
Condition 21–22 - Condition 21: Written notification of incidents, non-compliances and plan commitment breaches within 2 business days. Condition 22: Full details including corrective action, potential impacts and remedial method/timing within 10 business days.						
21	Written notification of any incident or non-compliance must be provided as soon as practicable and no later than 2 business days after becoming aware. Notification must specify: condition in breach; description; location/date/time; corrective measures.	Review the project incident and non-compliance register. For each recorded incident or non-compliance, confirm written notification to DCCEEW was provided within 2 business days. Review correspondence records for completeness against all four required notification elements.	Water-quality TARP for DS01, 28–31 January 2026, marked "Incident: Yes". Dissolved oxygen recorded in the high-risk exceedance band (<36%) for more than 48 hours; in situ probe sampling confirmed the readings (i.e. not an instrument artefact, distinguishing this event from the September 2025 DS01 probe malfunction). The TARP records the Level 1–3 adaptive-management response: comparison against the control site (>70% DO, ~350 m from the siphon inlet), increased monitoring frequency and sampling through the water column, mobilisation of an aeration trailer (late January to early March 2026), and downstream monitoring for distressed fish, with no distressed or dead fish observed. The SQP conclusion recorded on the TARP was that the low dissolved oxygen could result from high-biological-oxygen-demand lake water released via the siphons, that it did "not appear to be project related", and that works were not required to stop; recommended BOD testing	Seqwater Condition 21 notification email to Audit@dcceew.gov.au (Nathan Carruthers), 3 July 2026, within FW_EPBC_20178078__Compliance_Report_and_Independent_Audit.pdf; DCCEEW/Seqwater/John Holland correspondence chain, 24 February to 17 May 2026; Fishology Consulting Lake Macdonald Quarterly Monitoring Reports 1, 2 and 3; LMDIP-10000-GNL-ENV-REP-00002 (Rev 2, 15 January 2026) and LMDIP-10000-GNL-ENV-REP-00003 (Rev 1, 20 March 2026); 01. Master Water Quality Register.xlsx; AMP Rev 15 / Rev 16, Table 3-2 (water quality management, reporting) and Section 8 (Incident and Contingency Planning). LMDIP Incident Investigation Report (Conditions 20 & 23 non-conformance), submitted to National	Non-Compliant - a reportable incident was not notified to DCCEEW within the timeframe required by Condition 21. On 28–31 January 2026, dissolved oxygen at DS01 sat in the high-risk exceedance band (<36%) for more than 48 hours, confirmed by in situ probe sampling; the approval holder's own Trigger Action Response Plan records this as "Incident: Yes". Under the AMP an incident is "any event which has the potential to, or does, impact on one or more protected matter(s)", and Table 13-1 requires DCCEEW to be notified of any incident within 2 business days (Conditions 21 and 22). The event met that definition, an aeration trailer was mobilised and downstream monitoring was undertaken for distressed fish, yet no Condition 21 notification was made. The approval holder advised it did not report the event on the basis that the low dissolved oxygen was assessed as not project-related. That assessment is drawn from the AMP's water-quality framework, but that framework	N

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			(commissioned March–June 2026). Dissolved oxygen fluctuated between normal and high-risk until a rain event on 15 February 2026. The approval holder confirmed (Simon Orchard, email, 4 August 2026) that no Condition 21 notification to DCCEEW was made for this event, on the basis that it was assessed as not project-related. No corresponding entry appears in the incident and non-compliance register provided for the audit period.	EPA 17 July 2026; National EPA acknowledgement, 21 July 2026; Water Quality TARP – DS01 (28-01-26 to 31-01-26); LMDIP Incident and Non-Compliance Register (provided July 2026); Approval holder correspondence confirming the event was not notified.	governs the adaptive-management response (which controls to apply) rather than the reporting obligation, which is triggered by the event being an incident regardless of cause. No impact to a Matter of National Environmental Significance was identified. The exceedance was investigated under the TARP, an aerator was deployed, downstream monitoring recorded no distressed or dead fish, and dissolved oxygen recovered following a rain event on 15 February 2026. The non-compliance is therefore procedural, rather than an event resulting in environmental harm.	
22	Full details of any incident or non-compliance must be provided to DCCEEW within 10 business days, specifying: corrective action taken or intended; potential impacts; method and timing of remedial action.	Review follow-up correspondence to DCCEEW each reportable incident or non-compliance. Confirm submission within 10 business days and confirm all three required information elements are addressed.	Condition 22 requires full details of any incident or non-compliance to be provided to the Department within 10 business days, specifying the corrective action taken or intended, the potential impacts, and the method and timing of the remedial action. This obligation arises from the occurrence of a reportable incident or non-compliance itself, it is not contingent on a Condition 21 notification having actually been given. Table 13-1 of the AMP requires both the Condition 21 notification (within 2 business days) and the Condition 22 detailed report (within 10 business days) for the same event. The 28–31 January 2026 dissolved-oxygen exceedance at DS01 (see Condition 21) met the AMP’s definition of a reportable incident. The approval holder recorded it as “Incident: Yes” in its Trigger Action Response Plan and responded with increased monitoring, an aeration trailer deployed from late	Seqwater Condition 21 notification email to Audit@dcceew.gov.au (Nathan Carruthers), 3 July 2026, within FW_EPBC_20178078__Compliance_Report_and_Independent_Audit; DCCEEW/Seqwater/John Holland correspondence chain, 24 February to 17 May 2026; AMP Rev 15 / Rev 16, Section 8 (Incident and Contingency Planning) and Table 13-1 (EPBC reporting requirements). Water Quality TARP – DS01 (28-01-26 to 31-01-26); LMDIP Incident and Non-Compliance Register (provided July 2026), correspondence (Simon Orchard, 4 August 2026) confirming the event was not notified. Fishology Consulting Lake Macdonald Quarterly Monitoring Reports 1, 2 and 3; LMDIP-10000-GNL-ENV-REP-00002 (Rev 2, 15 January 2026) and LMDIP-10000-GNL-ENV-REP-00003 (Rev 1, 20 March 2026)	Non-Compliant - The approval holder did not provide DCCEEW with full details of the 28–31 January 2026 dissolved-oxygen incident at DS01 (see Condition 21) within 10 business days, or subsequently. Condition 22 requires a detailed report when a reportable incident occurs, whether or not the initial notification required by Condition 21 was given. This is consistent with Table 13-1 of the AMP, which sets separate deadlines for the initial notification and detailed report. The approval holder’s TARP recorded the event and its response, including deployment of an aeration trailer and downstream checks for distressed fish. However, the approval holder did not provide DCCEEW with the required details of corrective action, potential impacts, or the method and timing of remedial action.	N

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			January to early March 2026, and downstream checks for distressed fish. None were observed. Simon Orchard (John Holland, email 4 August 2026) confirmed that no Condition 21 notification was made for this event, on the basis that it was assessed as not project-related. No Condition 22 detailed report was made either, and no corresponding entry appears in the incident and non-compliance register provided for the audit period.			
Independent Audit Conduct (Conditions 23–25)						
Condition 23–25 - Condition 23: Independent audits for each 12-month period. Condition 24: Auditor nomination and criteria to Department; audit commences only after written approval; report submitted within approved timeframe. Condition 25: Audit report published within 10 business days of DCCEEW approval and kept published until 2035.						
23	Independent audits of compliance with the conditions of this approval must be conducted for each 12-month period following the date of commencement of the action, or otherwise in accordance with an annual date agreed to in writing by the Minister.	Confirm the 12-month audit periods run from the actual commencement of the action (6 November 2024). Confirm an independent audit has been or is being conducted for each such period and that the cycle aligns with commencement rather than a later notified date.	Commencement of the action occurred on 6 November 2024 (see Conditions 14 and 15). The first 12-month period under Condition 23 was therefore 6 November 2024 to 5 November 2025. The approval holder's second commencement notification (30 May 2025) treated 26 May 2025 as the commencement date, and the project structured its Condition 20 reporting and Condition 23 audit cycles to that later date. The Condition 21 self-report (3 July 2026) records that the timing of the annual audits and reports was structured to align with the later notification. Consistent with that basis, the Audit Criteria and Methodology (EWA0050.1, Rev 1) defined the audit period as 1 June 2025 to 31 May 2026, a period that does not correspond to any 12-	Seqwater commencement notification ref D24/283386, 7 November 2024 (Olivia Newman) - DCCEEW__Commencement_notification.pdf; Seqwater commencement notification ref D25/103857, 30 May 2025 (Richard Plowes) - D25103857...Notification_of_commencement_of_the_action.pdf; Seqwater Condition 21 self-report email, 3 July 2026 (Nathan Carruthers) - within FW_EPBC_20178078__Compliance_Report_and_Independent_Audit.pdf.	Non-compliant - The independent audit cycle was keyed to an incorrect commencement date. Condition 23 requires an audit for each 12-month period following the commencement of the action, being 6 November 2024, unless another annual date has been agreed in writing by the Minister. No such agreement was sighted.	N

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
			month period following the actual commencement of the action. DCCEEW approved the audit criteria on 29 May 2026; the Department's review required Conditions 14 and 15 to be actively assessed rather than marked Not Applicable, but did not identify the audit period as incorrect. No agreement in writing by the Minister to an alternative annual audit date was sighted. The first 12-month period ended 5 November 2025. The auditor's nomination was approved by DCCEEW on 30 March 2026 and the audit criteria approved on 29 May 2026, with the audit conducted thereafter. No independent audit was conducted for the correct first 12-month period until the audit period was re-cast during the course of this audit (see Section 4.3).			
24	For each independent audit the approval holder must: (a) provide the auditor's name and qualifications and the draft audit criteria to the Department; (b) commence the audit only after the criteria are approved in writing by the Department; and (c) submit the audit report within the timeframe specified in the approved audit criteria.	Review DCCEEW's approval of the auditor nomination and its written approval of the audit criteria. Confirm the audit commenced only after criteria approval, and that the report is submitted within the approved timeframe.	The approval holder nominated Corey Brond (EWA Environmental) as independent auditor; DCCEEW approved the nomination (letter, 30 March 2026). Draft audit criteria (EWA0050.1) were provided to DCCEEW on 28 April 2026. DCCEEW reviewed and required amendments to the draft criteria in relation to Conditions 14 and 15 (11 May 2026); amended criteria were submitted on 19 May 2026 and approved in writing by DCCEEW on 29 May 2026, before the audit proceeded. The audit report is to be submitted within the approved timeframe.	DCCEEW/Seqwater/JHG correspondence chain 'EPBC 2017/8078 - Compliance Reporting and Independent Audit - amendment to draft audit criteria' [SEC=OFFICIAL], 27 March - 29 May 2026 (auditor nomination approved 30 March 2026; audit criteria approved 29 May 2026) - within FW_EPBC_20178078__Compliance_Reporting_and_Independent_Audit.pdf; Audit Criteria and Methodology (EWA0050.1, Rev 1).	Compliant - The Condition 24 process for the current audit was followed: the auditor nomination was approved by DCCEEW (30 March 2026) and the audit criteria were approved in writing (29 May 2026) before the audit proceeded, satisfying 24(a) and 24(b). Submission of the audit report within the approved timeframe (24(c)) is to be confirmed on submission of this report.	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
25	The audit report must be published on the Seqwater website within 10 business days of DCCEEW approval and kept published until 30 June 2035.	Applicable to any prior audit reports and to this current audit upon completion. Review the Seqwater website for evidence of any prior audit report publications. Confirm any prior audit reports are published within the required timeframe and remain accessible. This audit's publication compliance will be assessed in the subsequent audit period.	This is the first independent audit conducted under Condition 23 for the action (Audit Criteria and Methodology EWA0050.1, Section 1). There are accordingly no prior audit reports to which the publication obligation applies. The desktop review of the approval holder's website identified no independent audit reports published on the project page. This is consistent with this being the first audit. This audit report has not yet been submitted to or approved by DCCEEW. The obligation under Condition 25 falls due only on the Department's approval of an audit report, and has therefore not yet arisen.		NA - Not triggered.	NA
Plan Revisions (Conditions 26–31)						
Conditions 26–31: Procedures for Ministerial application for RAMP, self-revision without Ministerial approval where no new/increased impact, notification requirements for self-revision, revocation of self-revision, and Ministerial override where new/increased impact identified.						
26	Condition 26: If the approval holder has at any time applied to the Minister for a variation to an approved management plan under section 143A, the revised plan (RAMP) must be implemented from the date specified.	Review DCCEEW correspondence records for any formal applications under condition 26 (s.143A variations). Confirm any ministerially-approved RAMPs have been implemented from the specified date. Note the AMP is at Rev 15, confirm the revision pathway for each version (ministerial vs self-revision).	A DCCEEW approval letter (7 May 2025, Neil Millar, A/g Director Post Approvals) confirms Seqwater sought approval of a revised AMP under Condition 26 (email 24 April 2025) and the delegate approved 'the Adaptive Management Plan - Lake Macdonald (Six Mile Creek) Dam Improvement Project, revision 14, dated 22 April 2025', to be implemented for all water drawdown activities for the duration of the approval. Rev 14 was subsequently superseded via the Condition 27 self-revision pathway (to Rev 15, implemented 14 August 2025, and Rev 16, proposed May 2026 - see 27-28).	DCCEEW letter 'Approval of revised Adaptive Management Plan for Six Mile Creek Dam Safety Upgrade Project (2017/8078)', dated 7 May 2025.	Compliant - A Condition 26 Ministerial-approval event is documented and the approved plan (Rev 14) was implemented from its approval date, consistent with the condition. The plan was further revised via the separate Condition 27 pathway (see 27-28).	Y
27	The approval holder may choose to revise an action management plan	Review the AMP revision history (Rev 1 through Rev 15). For each revision	The AMP was submitted and approved under Conditions 3 and 7 on 7	Seqwater letter to DCCEEW 'Submission of RAMP in accordance	Compliant - The approval holder was entitled to revise the approved plan	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
	approved by the Minister under condition three (3) and condition seven (7), or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the RAMP would not be likely to have a new or increased impact.	made under condition 27 (self-revision). confirm all condition 28 notification requirements were met: electronic RAMP copy, tracked-changes version, explanation of differences, justification that no new or increased impact arises, and implementation date notice ≥20 business days prior. Review DCCEEW correspondence records for each revision notification.	December 2020. Revision 14 was subsequently approved by the Minister on 7 May 2025 under the Condition 26 pathway. Seqwater's submission letter (Ref LMDIP-10000-GNL-PLA-LTR-00002 / D26/83705, 7 May 2026) records that the AMP was amended via the RAMP process authorised under Condition 27 on 8 May 2025 and 14 August 2025, with the then-current version implemented on 14 August 2025. DCCEEW's response confirmed the submission adequately addressed approval conditions 27 and 28 and that no further information was required. A further revision (Rev 16) was submitted on 7 May 2026 for implementation not before 5 June 2026, accompanied by an assessment concluding that the amendments would not result in a new or increased impact on protected matters. The amendments comprise stilling-basin water quality monitoring frequency, removal of redundant low-flow-slot and upstream cofferdam design references, and replacement of two inaccessible upstream water quality control sites. No notice from the Minister under Condition 30 was identified.	with Condition 27 & 28' (Ref D26/83705), 7 May 2026; DCCEEW email (Alice Shields), 'RAMP Six Mile Creek Dam Safety Upgrade (2017/8078)', 14 August 2025.	under Condition 27 without Ministerial approval, and did so. The revisions sighted are administrative and monitoring-related in nature, supported by an assessment that no new or increased impact would arise, and DCCEEW raised no objection to the self-revision pathway being used. No Ministerial notice under Condition 30 has been issued that would displace the operation of Condition 27.	
28	Notification requirements for self-revised plans. Where the approval holder has revised an approved management plan under Condition 27 (without Ministerial approval), it must provide the Department with: (a) an electronic copy of the revised plan (RAMP); (b) a tracked-changes version showing the differences from the	Confirm all notification requirements were met: electronic RAMP copy, tracked-changes version, explanation of differences, justification that no new or increased impact arises, and implementation date notice ≥20 business days prior. Review DCCEEW	Revision 15 was provided to DCCEEW on 1 August 2025 and implemented on 14 August 2025 (Seqwater letter D26/83705), approximately nine business days between notification and implementation. Taking the alternative date of 18 August 2025 (the date on the Rev 15 document control page), the interval is approximately	EPBC Approval 2017/8078 (7 November 2019), Condition 28 – 2017-8078-approval-decision.pdf Seqwater letter to DCCEEW, 'Submission of RAMP in accordance with Condition 27 & 28 of Approval Six Mile Creek Dam Safety Upgrade, Queensland (EPBC 2017/8078)', Ref	Compliant - Notice of implementation for AMP Revision 15 was approximately nine business days, materially less than the 20 business days Condition 28(e) nominally requires. DCCEEW's email of 14 August 2025 confirms the Revision 15 submission adequately addressed Conditions 27 and 28 and that no further information was	Y

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
	approved plan; (c) an explanation of those differences; (d) justification that the revision is not likely to result in a new or increased impact on protected matters; and (e) written notice of the date on which the revised plan will be implemented, given at least 20 business days in advance.	correspondence records for each revision notification.	eleven business days. On either basis the notice period is materially less than the 20 business days required. DCCEEW responded on 14 August 2025 confirming the Revision 15 submission adequately addressed approval conditions 27 and 28 and that no further information was required. Revision 16 was submitted on 7 May 2026 for implementation not before 5 June 2026, an interval of approximately 20 business days, accompanied by Attachment A (Summary of AMP Changes) and Attachment B (tracked-changes copy of the RAMP), together with an explanation of each amendment and a justification of no new or increased impact. The Rev 16 notice meets the 20-business-day requirement. The Rev 16 submission letter also refers to a Condition 27 amendment on 8 May 2025. No Condition 28 notification documents were sighted for that revision.	LMDIP-10000-GNL-PLA-LTR-00002 (D26/83705), 7 May 2026, records the Condition 27 amendments of 8 May 2025 and 14 August 2025, implementation of the current version on 14 August 2025, and the Rev 16 implementation date of not before 5 June 2026; lists Attachment A (Summary of AMP Changes April 2026) and Attachment B (tracked-changes RAMP) DCCEEW email (Alice Shields, Post Approvals), 'RAMP Six Mile Creek Dam Safety Upgrade (2017/8078)' [SEC=OFFICIAL], 14 August 2025, confirms the Revision 15 submission adequately addresses approval conditions 27 and 28 and that no further information is required DCCEEW email (Post Approvals), 'RE: RAMP Six Mile Creek Dam Safety Upgrade (2017/8078)' [SEC=OFFICIAL], 11 May 2026, acknowledgement of the Rev 16 submission (forwarded to the auditor by Seqwater/John Holland, 9 July 2026) Adaptive Management Plan Rev 15 (LMDIP-05327-GNL-ENV-MPL-00002), dated 18 August 2025, document control page Adaptive Management Plan Rev 16 (LMDIP-05327-GNL-ENV-MPL-00002), dated 1 May 2026 DCCEEW letter, 'Approval of revised Adaptive Management Plan for Six Mile Creek Dam Safety Upgrade Project (2017/8078)', 7 May 2025, Ministerial approval of Rev 14 under Condition 26 (context for the 8 May 2025 Condition 27 amendment)	required. The auditor treats this Departmental correspondence, received before the equivalent Revision 16 cycle and raising no objection to the notice given, as the Department's acceptance of the notice period for this revision. The equivalent requirement was met in full for Revision 16 (approximately 20 business days' notice). The approval holder should not rely on informal acceptance in future and should seek the full 20 business days, or DCCEEW's written agreement to a shorter period, before implementing any further self-revision.	

Cond	Condition / Criteria	Verification Method	Evidence	Documents Sighted	Determination	Finding
29	Condition 29: Where the approval holder has revoked a choice to implement a RAMP under condition 27, written notice must have been given to DCCEEW and the prior approved plan reinstated.	Review records for any revocations of condition 27 self-revision decisions during the audit period. Confirm written notice was provided to DCCEEW. Note as NA if no revocations have occurred.	Condition 29 is triggered only where the approval holder has revoked a choice to implement a revised plan under Condition 27		NA – Not Triggered	NA
30–31	Conditions 30–31: If the Minister has given notice that a RAMP would be likely to have a new or increased impact, condition 27 does not apply and the approval holder must implement the plan specified by the Minister.	Review DCCEEW correspondence for any notices issued under condition 30 during the audit period. If issued, confirm the approval holder has ceased implementation of the relevant RAMP and has implemented the plan directed by the Minister. Note as NA if no such notice has been issued.	Condition 30 concerns the Minister giving notice that a revised plan would be likely to have a new or increased impact on protected matters, and Condition 31 the consequence, being that Condition 27 does not apply and the approval holder must implement the plan specified by the Minister. Condition 31 can only operate where a Condition 30 notice has been given.		NA – Not Triggered	NA
Completion (Condition 32)						
Condition 32 - Within 30 days after completion of the action, the approval holder must notify the Department in writing and provide completion data (environmental report and spatial information in shapefile format).						
32	Written notification and completion data to be provided within 30 days of completion of the action.	Confirmed as Not Applicable, See Appendix B register.	See Appendix B.	See Appendix B.	Future obligation. The action has not yet been completed. Estimated to be triggered upon permanent cessation of all activities, approximately 2030. To be addressed in a future audit period.	NA

10. Non-Compliances Register

The following consolidates the non-compliances identified in this audit. Full detail is provided in the matrix at Section 9.

10.1. Non-Compliances

Condition	Description	Rating	Recommended corrective action
20.a	Annual compliance reporting cycle keyed to 26 May 2025 rather than the actual commencement (6 Nov 2024); the annual compliance report for the audit period has not been published.	Non-Compliant	Realign the reporting cycle to 6 Nov 2024, prepare and publish the outstanding annual compliance report, and address in the Condition 21 self-report.
21	Written notification of incidents/non-compliances to DCCEEW within 2 business days. A high-risk dissolved-oxygen exceedance at DS01 (28–31 January 2026), recorded by the approval holder as an incident, was not notified to DCCEEW as required. No impact to MNES was identified; the non-compliance is procedural.	Non-Compliant	Make a retrospective Condition 21 notification to DCCEEW (see Recommendation 3), and review the internal process for classifying TARP outcomes against the AMP's incident definition so that reporting decisions are not made solely on a project-relatedness assessment.
22	Full details of an incident or non-compliance (corrective action, potential impacts, remedial timing) to be provided to DCCEEW within 10 business days. Full details of the DS01 dissolved-oxygen incident (28–31 January 2026) were not provided to DCCEEW within that timeframe, or at all. No impact to MNES was identified; the non-compliance is procedural.	Non-Compliant	Make a retrospective Condition 22 detailed report to DCCEEW covering corrective action, potential impacts and remedial timing for the DS01 event, alongside the retrospective Condition 21 notification (see Recommendation 3).

23	Independent audit cycle keyed to 26 May 2025; no audit conducted for the first 12-month period until this audit was re-cast.	Non-Compliant	Confirm the re-cast catch-up period with DCCEEW and realign future audit cycles to 6 Nov 2024, or seek the Minister's written agreement to an alternative annual date. Note: as of 22 July 2026 the Department had acknowledged the Condition 21 self-report and the incident report but had not agreed to an alternative cycle date. The approval holder's proposal to retain the May 2025 anniversary (incident investigation corrective action #2) requires the Minister's written agreement under Condition 23, which has not been obtained.
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11. Recommendations

1. Commencement and cycle alignment: confirm DCCEEW's acceptance of the commencement date (6 November 2024) and the resulting position on Conditions 14 and 15, and realign the Condition 20 reporting and Condition 23 audit cycles to that date, as part of the approval holder's Condition 21 self-report. If a different annual date is preferred, seek the Minister's written agreement under Condition 23.
2. Annual compliance report: prepare and publish the outstanding annual compliance report for the audit period, including the clearance shapefile required by the approval, notify DCCEEW with the weblink within 5 business days of publication, and retain the report on the website for the duration of the approval period (Conditions 20.a to 20.e).
3. Retrospective incident notification (Condition 21 and 22). Make a late written notification to DCCEEW for the 28–31 January 2026 DS01 dissolved-oxygen incident, attaching the TARP and stating the reason it was not notified at the time, together with the full details required under Condition 22 (corrective action taken, potential impacts, and the method and timing of the remedial action already undertaken). Separately, review and clarify the internal procedure for assessing TARP outcomes so that the reporting decision is made against the AMP's definition of an incident (potential to impact a protected matter) and Table 13-1, independently of the project-relatedness question that drives the adaptive-management response.
4. Water quality (dissolved oxygen): the Sep–Oct 2025 DS01 low-DO readings were resolved under a water-quality TARP as a probe malfunction. Complete the round-2 BOD diagnostic (Aug 2026) for the onsite low-DO investigation, report the outcome in the next quarterly compliance report, and close out (Conditions 5.a.ii, 5.e.iv).
5. Plan revision notification: confirm the actual implementation date for Revision 15 of the Adaptive Management Plan, and review the notification process to ensure the full 20 business days' notice is given before implementing future self-revisions, rather than relying on the Department's after-the-fact acceptance of the submission's content, as occurred for Revision 15.
6. Mary River Cod: no action required on the relocation approach, Condition 10(d) permits permanent relocation of Mary River Cod, and Condition 10(e) is not engaged where no temporary relocation occurs. Provide the DAF-reviewed AMP (§5.5.4.2.1, Tables 5-4 and 5-7 relocation sites)

and the DAF cod notification for the record, and correct the capture-date discrepancy in the AMP (8 versus 9 July 2025).

7. Incident and non-compliance register: register provided and examined; all period entries recorded and closed. Obtain the approval holder's written confirmation that no notifiable incidents, non-compliances or plan-commitment breaches arose beyond the self-reported Condition 20/23 non-conformance (Conditions 21, 22)
8. Publication and sensitive data: confirm the publication dates for each approved plan against the 10 business day requirement, and establish and document an assessment against the Sensitive Ecological Data Policy V1.0 as a step in the publication process (Conditions 18.b, 18.c, 20.d).
9. Spatial data: confirm whether monitoring data, survey reports, maps and spatial metadata are prepared in accordance with the Department's Biological Survey and Mapped Data Guidelines (2018), and ensure the completion data required under Condition 32 is prepared on that basis (Condition 19).

12. Conclusion and Audit Opinion

12.1. Basis of the Opinion

This audit was conducted in accordance with the Independent Audit and Audit Report Guidelines (2019) and the Audit Criteria and Methodology approved by DCCEEW on 29 May 2026 (EWA0050.1, Rev 1), subject to the re-casting of the audit period described at Section 4.3. The audit assessed all 63 condition elements of EPBC Approval 2017/8078 through desktop review of project records, monitoring datasets and Departmental correspondence, a site inspection undertaken on 9 July 2026, interviews with Seqwater and John Holland Group personnel, and review of the approval holder's website. No condition element was left unassessed. The opinion below is subject to the limitations recorded at Section 6.

12.2. Opinion on Compliance

In the auditor's opinion, the approval holder has substantially complied with the conditions of EPBC Approval 2017/8078 during the audit period, with the exception of four non-compliances, the timing of the annual compliance reporting cycle (Condition 20.a), the independent audit cycle (Condition 23), the failure to notify a reportable water-quality incident at DS01 within the timeframe required by Condition 21, and the failure to provide full details of that incident within the timeframe required by Condition 22.

The first two non-compliances arise from a single cause. The approval holder proceeded on the basis that the action commenced on 26 May 2025, when the earliest and contemporaneous record establishes commencement on 6 November 2024. The annual reporting and audit cycles were structured to the later date, with the consequence that the annual compliance report for the first 12-month period has not been prepared or published, and no independent audit was conducted for that period until this audit was re-cast during its conduct. The approval holder identified the error and self-reported it to the Department under Condition 21 on 3 July 2026. The third and fourth non-compliances are separate and arise from the same event. A high-risk dissolved-oxygen exceedance at DS01 (28–31 January 2026), recorded by the approval holder as an incident, was not notified to the Department within 2 business days as Condition 21 requires, and full details of the incident were not subsequently provided within 10 business days as Condition 22 requires. No impact to a Matter of National Environmental Significance was identified, both non-compliances are procedural.

No non-compliance was identified against any condition specific to the action. The substantive environmental protections imposed by Conditions 1 to 13, the limits on the project area and clearing extent, the drawdown timing and bankfull constraints, the water quality and habitat monitoring program, and the aquatic fauna salvage and relocation requirements, were implemented as approved.

Four further elements were rated Compliant, on matters concerning verification, documentation or follow-through rather than any identified failure of the management measures themselves. Two water-quality elements (5.a.ii, 5.e.iv) pending completion of diagnostic BOD testing, Condition 14, where the core notification obligation was met but the commencement notification record was subsequently duplicated and inconsistent and Condition 28, where the notice period given before implementing Revision 15 of the Adaptive Management Plan was materially shorter than the condition requires, notice which DCCEEW's contemporaneous correspondence is treated as having accepted, a discrete matter unrelated to the commencement-date error.

12.3. Opinion on the effectiveness of management measures

In the auditor's opinion, the management measures implemented under the Adaptive Management Plan were effective in achieving their principal objective of avoiding harm to Matters of National Environmental Significance during the lake drawdown and construction. Drawdown releases remained well within the receiving capacity of Six Mile Creek; the siphon inlet exclusion screening operated within its design approach velocity and no entrainment was recorded; salvage and relocation operations were completed under permit with no recorded mortality or injury of a protected matter; and the water quality monitoring program detected trigger exceedances and prompted an operational response.

One limitation qualifies this opinion. The September 2025 DS01 low dissolved-oxygen readings were resolved as a monitoring-probe malfunction, and the diagnostic BOD testing of the downstream low-DO investigation is in progress (round 1 inconclusive; round 2 due August 2026), so the cause of the broader low-DO pattern is not yet confirmed.

12.4. Overall conclusion

The findings show a project implementing its substantive environmental protections effectively, while its administrative compliance systems have not kept pace. All of the non-compliances concern notification, reporting, publication and record-keeping obligations rather than environmental performance. No evidence was identified of material impact to Matters of National Environmental Significance arising during the audit period, subject to the qualification that certain monitoring and records were incomplete or unavailable at the time of the audit. The matters identified are correctable, and the corrective actions recommended at Sections 10 and 11 are directed to that end.

Appendix A - Approved Audit Criteria and Methodology (EWA0050.1)

This audit was conducted against the Audit Criteria and Methodology for the Lake Macdonald (Six Mile Creek) Dam Improvement Project (EWA0050.1, Rev 1, 18 May 2026), submitted to DCCEEW under Condition 24 and approved in writing on 29 May 2026.

The audit criteria matrix contained in that document (Section 10) is reproduced in full at Section 9 of this report, with the Evidence, Documents Sighted, Determination and Compliance Finding columns completed. The approved document is held by the approval holder and the Department and is available on request.

Departures from the approved criteria are identified and explained in this report, being the re-casting of the audit period (Section 4.3) and the reclassification of Conditions 23 and 24 from Not Applicable to active findings (Sections 4.3 and 9).

Appendix B - Conditions Rated Not Applicable

The following conditions are rated Not Applicable for the re-cast audit period, on the basis that they are one-off pre-commencement requirements already satisfied and confirmed by Ministerial approval, future obligations not yet triggered, or contingent obligations dependent on events that have not occurred. (Note: Conditions 23 and 24, grouped and treated as Not Applicable in the draft methodology, are split and assessed as active findings in this report following the re-cast of the audit period: Condition 23 Non-Compliant, Condition 24 Compliant.)

Condition	Requirement summary	Justification for NA rating	Basis / evidence
2(a)	Identify and map habitat of protected matter(s) prior to commencement.	One-off pre-commencement requirement satisfied by habitat mapping completed July 2020 (AMP Rev 15 Appendix G) and confirmed by Ministerial approval of the AMP.	AMP Rev 15 App. G; DCCEEW approval of AMP
3.1 / 7.1	AMP and AFSRMP submitted and approved by the Minister prior to commencement.	Pre-commencement administrative requirement. Ministerial approval of AMP Rev 15 (incorporating the AFSRMP) confirms both were satisfied prior to commencement. Audit focuses on implementation.	DCCEEW approval letter for AMP Rev 15
4 / 8	Independent expert review of AMP and AFSRMP provided to DCCEEW at submission.	Administrative requirement satisfied prior to plan approval. Ministerial approval of AMP Rev 15 confirms independent expert reviews were received. No current-period implementation obligation.	AMP Rev 15 Section 13; DCCEEW approval of AMP
5.c	AMP habitat remediation measures	Not triggered in the audit period. Remediation (notably post-refill vegetation die-back works) is not yet due, as the project has not reached the rehabilitation stage.	AMP Rev 15 Section 9; LMDIP quarterly compliance report Section 5; Fishology monitoring reports.
11	Significant Impact Assessment within 6 months of completion of monitoring under conditions 5 and 9.	Future obligation not yet triggered. Monitoring under conditions 5 and 9 is ongoing; estimated to be triggered upon completion of	AMP Rev 15 Section 13; approval expiry 30 June 2035

Condition	Requirement summary	Justification for NA rating	Basis / evidence
		post-construction monitoring (approx. 2030).	
12	SIA and independent review publicly available within 9 months of monitoring completion.	Future obligation contingent on completion of condition 11. Not triggered in this audit period.	Contingent on condition 11
13	Offset Plan submitted if the Minister determines residual significant impacts.	Contingent obligation only triggered if the future SIA identifies residual significant impacts and the Minister issues a written direction. No direction has been issued.	No direction received from DCCEEW
18(a)	Submit plans electronically to DCCEEW for Ministerial approval.	Administrative submission requirement completed. AMP Rev 15 submitted to and approved by DCCEEW. No ongoing electronic submission obligation for plans already approved.	DCCEEW approval letter for AMP Rev 15
19.1	Monitoring/spatial data prepared to the Biological Survey and Mapped Data Guidelines (2018) and submitted electronically.	Not triggered in the audit period; submission is via the annual compliance report, which has not been published (see Condition 20.a).	AMP Rev 15/16 Sections 12–13; Biological Survey and Mapped Data Guidelines (2018)
20.b	DCCEEW notified by email with weblink within 5 business days of publication.	Not triggered. Contingent on publication of the annual compliance report, which has not occurred (see Condition 20.a).	Seqwater website desktop review; Condition 21 self-report, 3 July 2026.
20.c	Compliance reports kept publicly available until 30 June 2035.	Not triggered. No annual compliance report has been published to which the obligation attaches (see Condition 20.a).	Seqwater website desktop review.
20.d	Sensitive ecological data excluded/redacted from	Not triggered. Contingent on a published annual compliance report (see Condition 20.a).	Seqwater website desktop review;

Condition	Requirement summary	Justification for NA rating	Basis / evidence
	published compliance reports.		Sensitive Ecological Data Policy V1.0.
20.e	Full unredacted compliance report to DCCEEW within 5 business days where data excluded.	Not triggered. Contingent on a publication/exclusion event, which has not occurred (see Condition 20.a).	Seqwater website desktop review; Condition 21 self-report, 3 July 2026.
29	Revocation of a condition 27 self-revision RAMP.	Procedural mechanism only triggered if the approval holder has revoked a condition 27 self-revision. No such revocations understood to have occurred; to be confirmed from DCCEEW correspondence.	DCCEEW correspondence records
30–31	Ministerial notice that a RAMP would have new or increased impact.	Only triggered if DCCEEW issues a formal notice under condition 30. No such notice identified during the audit period.	DCCEEW correspondence records
32	Notification and completion data within 30 days of completion of the action.	Future obligation. The action has not been completed; estimated to be triggered upon permanent cessation of all activities (approx. 2030).	Project program; est. completion 2030



Appendix C - Site Inspection Record and Photographic Log

Site Inspection			
Date of Inspection:		9 July 2026	
Conducted by:		Corey Brond, EWA Environmental Pty Ltd (independent auditor)	
Attendees:		Simon Orchard, Environment & Sustainability Manager, John Holland Group; Nathan Carruthers, Senior Environmental Advisor, Seqwater; Elizabeth Delley, Environmental Trainee, John Holland Group	
Weather/Conditions:		Overcast, windy	
Areas Inspected:		Siphon discharge point and energy dissipation structure, Six Mile Creek downstream of the dam wall; Downstream receiving channel; Siphon intake; Temporary cofferdam; Construction and laydown areas; Perimeter drainage, sediment basin and erosion and sediment control measures; Stockpile stabilisation; Lake Macdonald shoreline.	
The inspection was undertaken following completion of the desktop review, consistent with the audit schedule at Section 5.2 of the approved Audit Criteria and Methodology. Matters raised in discussion during the inspection are recorded in the photographic log below and, where relied upon in this report, in the relevant condition findings and at Appendix D.			
	Location	Photo	Observation
1	Siphon discharge and energy dissipation structure, downstream Six Mile Creek.		Siphon discharge into Six Mile Creek downstream of the dam. HDPE discharge pipe releasing to a rock and concrete energy dissipation structure, producing turbulent aerated flow. Mesh rock bags and gabion mattress erosion protection installed at the discharge point and along the bank.



			
2	Siphon discharge and energy dissipation structure, Six Mile Creek		Downstream view of the dissipation structure showing stepped concrete energy dissipation blocks and rock bag protection. A floating silt curtain is deployed across the channel upstream of the discharge. Aeration at the discharge is consistent with the "fresh flush" adaptive-management response described for the downstream low dissolved-oxygen trend.

3	Siphon intake, Lake Macdonald (upstream of dam wall)		Five HDPE siphon intake lines extending into Lake Macdonald on orange flotation collars, with the intake screen assembly visible at the lake end. Bank protected with geotextile and rock bag armouring; work area delineated with bunting.
4	Temporary cofferdam crest, Lake Macdonald		Completed temporary cofferdam viewed along the crest, sheet-pile edged with gravel running surface, impounded lake water to the left and the isolated construction area to the right. Rock bag and gabion protection to the downstream face.



5	Perimeter drainage and sediment control		Rock-lined perimeter drain with geotextile-wrapped rock filter berm. Site boundary fence and retained vegetation immediately adjacent. Controls installed and appeared functional, no evidence of sediment escape beyond the disturbance footprint.
6	Type B – High Efficiency (flow through) Sediment basin		Geotextile-lined sediment basin, with rock-lined inlet and floating boom deployed across the basin. Batters stabilised with geotextile. Basin in service and retaining runoff on site. Auto-dosing unit and IBC with flocculant observed at inlet. Inlet structure free of debris, flow sensor free and clear of sediment deposits. Evidence of soil binder (Vital Bon-Matt HR) applied to adjacent stockpile noted during inspection, (stockpile surface laminated)

7	Type B – High Efficiency (flow through) Sediment basin		Second view of the sediment basin showing a modified IBC used for supplementary water treatment. Gypsum placed in the IBC, positioned at the basin edge and circulated with water. Evidence of soil binder (Vital Bon-Matt HR) applied to the adjacent stockpile was noted during the inspection, with the stockpile surface visibly laminated. Erosion and sediment controls observed to be actively managed, with treatment applied at both the source (stockpile stabilisation) and the receiving basin.
8	Lake Macdonald shoreline, drawdown extent		Lake Macdonald at lowered operating level, with exposed shoreline and drawdown margin visible along the far bank. Rock revetment in foreground. Floating silt curtain deployed along the shoreline appears damaged. Advised during the inspection (S. Orchard) that the curtain was deployed for the installation of the rock revetment, which has since been completed. Recommend confirm whether the silt curtain remains required for any ongoing or planned works at this location and, if so, repair or replace the affected sections; if no longer required, remove it from the waterway.

Appendix D - Interview Record

Interviews were conducted with key personnel from the approval holder (Seqwater) and the principal contractor (John Holland Group) as part of the audit methodology set out at Section 5. Personnel consulted were as follows:

Name	Role	Organisation
Nathan Carruthers	Senior Environmental Advisor	Seqwater
Simon Orchard	Environment & Sustainability Manager	John Holland Group
Jessica Grundy	Senior Environmental Advisor	John Holland Group
Elizabeth Delley	Environmental Trainee	John Holland Group
Lachy Macdonald	HSE Trainee	John Holland Group

The following personnel were not formally interviewed as part of the audit, but were available throughout to provide supporting information had it been required:

Name	Role	Organisation
Luke Anderson	Project Director	Seqwater
Andy O'Driscoll	Project Manager	John Holland Group

Interviews covered implementation of the Adaptive Management Plan, water quality monitoring and adaptive management responses, aquatic fauna salvage and relocation, drawdown management and inlet screening, compliance record-keeping systems, and the commencement date and associated notifications.

Matters raised during interview that are relied upon in this report include; the attribution of the low dissolved-oxygen readings at the downstream location to water ponding, and confirmation that the location was frequently monitored for signs of fish distress with none observed (Condition 5.a.ii); confirmation of the qualification requirements applied to personnel undertaking monitoring and data analysis (Condition 6.1); and advice that no incidents relating to EPBC matters occurred during the audit period (Condition 21.1).



Appendix E - Auditor Qualifications and Declaration of Independence

This appendix contains the curriculum vitae, evidence of qualifications and professional certifications, and the signed Declaration of Independence for the independent auditor, Corey Brond of EWA Environmental Pty Ltd.

These documents were provided to the Department in support of the auditor nomination under Condition 24(a), which DCCEEW approved on 30 March 2026. They are reproduced here in accordance with the Independent Audit and Audit Report Guidelines (2019), which require the curriculum vitae of the audit team to be submitted with the declaration, outlining relevant experience and qualifications. The declaration is referred to at Section 2.1 of this report.

Documents attached:

- Curriculum vitae - Corey Brond, EWA Environmental Pty Ltd, setting out qualifications, professional certifications and relevant experience, including current independent audit and third-party review engagements
- Declaration of Independence, signed 27 March 2026, in the form prescribed by the Independent Audit and Audit Report Guidelines (2019)
- Bachelor of Environmental Science, Charles Sturt University (20 December 2013)
- Master of Environmental Science and Management, University of New England (24 August 2024)
- Exemplar Global Lead Auditor, Environmental Management Systems Auditor - Certificate C-437248, valid to 5 October 2026 (scope: Environmental Management Audit; ISO 14001:2015 EMS Audit)
- Certified Professional Soil Scientist (CPSS), Soil Science Australia - valid to 31 December 2026
- Certified Professional in Erosion and Sediment Control (CPESC), EnviroCert International - Certification No. 8437, valid to 29 March 2027
- Certified Erosion, Sediment and StormWater Inspector (CESSWI), EnviroCert International - Certification No. 11625, valid to 1 November 2026
- Infrastructure Sustainability Accredited Professional (ISAP), Infrastructure Sustainability Council - ISAP Renewal FY26, valid 12 months from 18 August 2025

Corey Brond

Environmental Professional

Qualifications

- Bachelor of Environmental Science
- Master of Environmental Science and Management
- Certified Professional in Erosion and Sediment Control (CPESC)
- Certified Professional Soil Scientist (CPSS)
- Infrastructure Sustainability Accredited Professional (ISAP)
- Environmental Management Systems Lead Auditor ISO14001:2015

Relevant Experience

From	To	Position	Client/Company	Project name / Location
Aug 2025	Ongoing	Independent Environmental Auditor	John Holland, Seymour White JV	Beerburrum to Nambour Rail Upgrade
June 2024	Ongoing	Environmental Compliance Auditor	Koppens Construction	Yandina/Coolum Road upgrade, Bribie Island Road upgrade
Nov 2024	Ongoing	Independent Third-Party Reviewer and Certifier	QLD Hydro	Borumba Pumped Hydro Project
Nov 2020	Sept 2024	Environmental Manager	Bielbys BMD Joint Venture	Cooroy to Curra – Section D, South East Queensland
Jun 2020	Sept 2022	ESC Inspections and Environmental Compliance Audits	CPB Contractors	Mackay Northern Access Upgrade
Mar 2019	Mar 2020	Environmental Manager	CPB Contractors	Mackay Ring Road – Stage 1, Central Queensland
Mar 2016	Mar 2018	Environmental Manager	CPB Contractors	Cooroy to Curra – Section C, South East Queensland
Jan 2014	Mar 2016	Environmental Coordinator	Thiess Pty Ltd	Moreton Bay Rail Link, North Brisbane QLD
Dec 2011	Dec 2013	Snr Environmental Advisor	Thiess Pty Ltd	Caval Ridge North Bulk Earthworks and Caval Ridge Rail, Central Queensland
Sept 2010	Nov 2011	Environmental Advisor	Abigroup Contractors	Northern Pipeline Interconnector – Stage 2, Queensland
Nov 2009	Sept 2010	Environmental Advisor	Abigroup Contractors	Cooroy to Curra – Section B South East Queensland
June 2008	Nov 2009	Environmental Advisor	Abigroup Contractors	Hume Highway Southern Alliance, Southern New South Wales
June 2004	April 2008	Environmental Scientist	Coffey Geotechnics	Mobil Service Stations, Victoria and New South Wales
Nov 2007	Feb 2008	Environmental Scientist	Coffey Geotechnics	Mulwala Ammunition Facility, New South Wales
Dec 2004	Jan 2008	Environmental Scientist	Coffey Geotechnics	Casella Wines, New South Wales

Experience and Achievements

With over 20 years' experience as an environmental professional, Corey has strong skills in environmental management and independent environmental auditing. He offers experience in the construction and mining industry, particularly linear infrastructure including roads, pipelines and rail. Corey has worked on numerous projects for major corporations and government departments including the Department of Transport and Main Roads, the Australian Defence Force and Roads and Maritime Services. He has managed a diverse range of environmental projects utilising his professional expertise, excellent communication skills and proven report writing ability. Corey has undertaken independent environmental compliance audits and third-party reviews, including the assessment of project performance against environmental approvals, management plans and regulatory requirements. He is competent in the development and implementation of environmental management plans, preparing tender documentation, environmental compliance, environmental approvals, rehabilitation strategies and the development of erosion and sediment control plans.

Beerburrum to Nambour Rail Upgrade, South East Queensland

Corey has been engaged to undertake quarterly independent environmental audits for the project in accordance with the Project Scope and Technical Requirements, relevant environmental approvals and the Commonwealth approval issued under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) (EPBC 2020/8803). The scope of the audits includes assessment of applicable legislation, project approvals, permits and licences, and compliance with the Construction Environmental Management Plan and associated sub-plans, including the Grey-headed Flying-fox Roost Management Plan and Erosion and Sediment Control Plans. Corey undertakes detailed desktop reviews and site inspections to verify the implementation and effectiveness of environmental controls, including erosion and sediment management measures. The role includes auditing compliance against EPBC approval conditions, identifying non-conformances and observations, and the preparation of structured audit reports providing clear, evidence-based findings to support ongoing environmental compliance and project performance.

Borumba Pumped Hydro Project (Exploratory Works), Queensland

Corey has been engaged to undertake independent third-party review and certification of environmental management plans for the project. The works are subject to regulatory oversight and require alignment with Commonwealth and State approval conditions. Corey's role includes detailed review of management plans against legislative requirements, project approvals and relevant guidelines, ensuring that commitments are clearly defined and auditable. Corey provides independent certification that the plans meet the required standards, while also identifying gaps, inconsistencies and areas requiring clarification to support effective implementation and compliance.

Cooroy to Curra – Section D, South East Queensland

The sensitivity of the receiving environment and the topography of project alignment created some challenging environmental conditions. Initially as the project employed CPESC, Corey aided in the development and implementation of the erosion and sediment control plans and actively reviewed

and updated the overarching erosion and sediment control plans. Corey developed a number of stand alone plans for areas of particular high risk, including creek diversions and works around waterways. As the project progressed, Corey moved into an environmental management role, responsible for the ongoing management of all environmental obligations, including monitoring compliance with environmental approvals and management plans, coordinating site inspections and addressing non-conformances to support overall project compliance.

Mackay Ring Road – Stage 1

Corey was responsible for the ongoing management of the environmental and sustainability obligations including compliance with the legislative and contractual conditions. He managed the development and implementation of the overarching erosion and sediment controls plans and continually updated the plans to reflect the current stages of work and risk. Corey also aided in the delivery of the landscaping works, liaising with the contractors and client representative to produce a suitable final product in accordance with the contractual specifications.

Cooroy to Curra – Section C

Corey was responsible for implementing the environmental management system and processes for the project in accordance with the CPB Management System. He identified all required environmental mitigation measures and sustainability requirements in accordance with project requirements, and ensured all project environmental licences, statutory obligations and requirements were met.

Corey has applied award-winning erosion and sediment (ERSED) controls to protect the sensitive Mary River, reducing impacts and sustaining regulator satisfaction. Corey played a key role in the development and implementation of an innovative rehabilitation and revegetation strategy, ensuring rapid and efficient site stabilisation.

Moreton Bay Rail Link

This diverse project includes the design and construction of 14.1 kilometre of dual-track passenger line, six new rail stations, a stabling yard and a shared user path. The project provides some unique environmental challenges with complex environmental approval requirements. It is located close to a number of sensitive environmental areas including marine environments, tidal rivers and creeks, a RAMSAR wetland and Environmental Reserves. A large koala population is also present along the corridor. Corey's focus on this project was managing impacts on these ecologically significant areas, ensuring revegetation requirements were met, managing environmental compliance, liaising with stakeholders and regulatory bodies and ensuring all relevant approvals were obtained.

Caval Ridge North Bulk Earthworks & Rail Loop

This project involved the construction of civil infrastructure associated with the Caval Ridge Mine. The scope of work included the realignment of the Peak Downs Highway, the construction of over 10 kilometres of haul road, 6 kilometres of creek diversions, 17.5 kilometres of dual track rail line, two mine water dams and two permanent sediment basins. The large project needed to comply with rigid conditions to satisfy both the client requirements and the conditions outlined in an Environmental Authority. As Senior Environmental Advisor, Corey was responsible for ensuring compliance with the conditions of the Environmental Authority. He also liaised with client

representatives and regulatory agencies to ensure the environmental obligations were satisfied. Corey developed and oversaw the implementation of environmental management plans and erosion and sediment control plans. The project achieved 100% environmental compliance, with no formal breaches or regulatory involvement.

Northern Pipeline Interconnector

The Northern Pipeline Interconnector – Stage 2 involved the construction of approximately 28km of pipeline. As

Environmental Advisor on the project, Corey's responsibilities included: environmental compliance, implementing Environmental Management Plans; water quality and noise monitoring and reporting; erosion and sediment control plans and liaising with and reporting to stakeholders, regulatory authorities and government agencies.

Cooroy to Curra – Package B Queensland

This project involved 10kms of bulk roadworks. As Environmental Advisor, Corey's responsibilities included environmental compliance, reporting and implementing Environmental Management Plans; environmental monitoring including surface water monitoring; dust and noise monitoring; implementing erosion and sediment control plans; and liaison and reporting to regulatory authorities and government agencies.

Hume Highway Southern Alliance, New South Wales

This project involved 31kms of roadworks, including earthworks, pavements and bridges. Responsibilities included ensuring environmental compliance, including implementing Environmental Management Plans, environmental monitoring including ground and surface water monitoring, dust and vibration monitoring; erosion and sediment control, and liaison and reporting to regulatory authorities and government agencies

Mobil Service Stations, Victoria and New South Wales

Undertook site investigation and remediation programs associated with the redevelopment and decommissioning of petroleum service stations. Responsibilities included the design and implementation of field assessment programs, preparation of remedial action plans, liaison with regulatory authorities, and supervision of excavation works for impacted soils. Corey also conducted assessment and interpretation of soil and groundwater conditions to support remediation outcomes and ensure compliance with relevant environmental guidelines and regulatory requirements.



Appendix A—Auditor's Declaration of Independence

I, Corey Brond of EWA Environmental PTY LTD, Moonoolaba QLD declare that to the best of my knowledge and belief I and my organisation do not have any conflicting or competing interests with:

The Auditee John Holland Group, the Auditee's staff or representatives or other persons associated with the Auditee, including any personal, financial, business or employment relationship, except to the extent detailed below:

The project to be audited Lake Macdonald Dam Improvement Project.

I shall notify the Department of the Environment within seven days of any change in these circumstances or any other change that may affect my independent status.

I shall at all times observe any professional code of conduct and/or ethics applicable to undertaking audits (i.e. — as prescribed by the agency with which I hold accreditation/membership). I take full responsibility for any factual inaccuracy or mistake made in giving this declaration, particularly to the extent that others rely upon the truth of this declaration. I acknowledge that the Department of the Environment may request further information to verify my independence at any time.

Details of any personal, financial, business or employment relationship with the Auditee, the Auditee's staff, representatives or associated persons. (This is in the context of both the person making the declaration and the organisation that they are employed by – specify 'nil' if none):

NIL

Details of any personal, financial, business or employment relationship with the project to be audited. (This is in the context of both the person making the declaration and the organisation that they are employed by – specify 'nil' if none):

NIL

Details of audit qualifications and professional accreditations/memberships. (Include copies of current audit qualifications and current professional accreditations/memberships):

- Bachelor of Environmental Science
- Master of Environmental Science and Management
- Environmental Management Systems Lead Auditor ISO14001:2015
- Certified Professional in Erosion and Sediment Control (CPESC)
- Certified Professional Soil Scientist (CPSS)
- Infrastructure Sustainability Accredited Professional (ISAP)

In making this declaration, I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both. An extract of section 491 of the EPBC Act is attached

Signed

Full name (please print)

Corey Brond

Organisation (please print)

EWA Environmental Pty Ltd

Date

27/03/2026

Footnote:

1. Where an organisation or a team of auditors is nominated to undertake the audit, each individual that is nominated is to complete a separate declaration.
2. The curriculum vitae of all audit team members are to be submitted with the declaration outlining their relevant experience and qualifications.



EWA Environmental
T: 0417 082 525
ewaenvironmental.com.au
info@ewaenvironmental.com.au





Confirms that
Corey Brond

has satisfied all the requirements against PCDO4 Environmental Management Systems
(EMS) Certification Requirements, Edition 3 November 2023 for the grade of

Lead Auditor

in the Qualification Based

Environmental Management Systems Auditor

with the following Scope of Certification

- 01. Environmental Management Audit
- 02. ISO 14001:2015 EMS Audit

C-437248
Certificate Number

5 Oct 2022
Initial Certificate Date

5 Oct 2026
Expiry Date




Adam Bannon
Executive Managing Director



EWA Environmental
T: 0417 082 525
ewaenvironmental.com.au
info@ewaenvironmental.com.au



University of New England

By authority of the Council be it known that

Corey William Brond

*having fulfilled all the requirements and having passed
all the prescribed examinations was awarded the degree of*

Master of Environmental Science and Management

*and all the privileges attached
to the same on the 24th day of August 2024*



Chancellor



Vice-Chancellor and CEO



This is a digital record of a testamur issued by The University of New England. The secure original document should be viewed directly on the My eQuals website: www.myequals.edu.au
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EWA Environmental
T: 0417 082 525
ewaenvironmental.com.au
info@ewaenvironmental.com.au



*In the name of the Council and by the
authority of the same be it known that*

Corey William Brond

*having fulfilled all the requirements and having passed all
the examinations prescribed by the By-laws and Rules of the
University has this day been admitted to the degree of*

Bachelor of Environmental Science

*with all the rights and privileges attached thereto and
in witness whereof the Council has authorised the
Common Seal of the University to be hereunto affixed.*

CORONAL SEAL AFFIXED ON THIS
TWENTIETH DAY OF DECEMBER
TWO THOUSAND AND THIRTEEN
A12261362

A handwritten signature in black ink, appearing to read 'D. Brond', written over a horizontal line.

Chancellor

A handwritten signature in black ink, appearing to read 'Andrew Vann', written over a horizontal line.

Vice-Chancellor and President

Appendix F - Key Correspondence

This appendix contains the correspondence relied upon in the findings of this audit, principally in relation to the commencement of the action (Conditions 14 and 15), the alignment of the annual reporting and independent audit cycles (Conditions 20 and 23), the appointment of the independent auditor and approval of the audit criteria (Condition 24), and the revision of the Adaptive Management Plan (Conditions 26 to 28).

Correspondence is listed chronologically. Where correspondence forms part of an email chain, the chain is attached in full to preserve context.

Commencement of the action

Date	Document
7-Nov-24	Seqwater notification of commencement of the action to DCCEEW, Ref D24/283386 (Olivia Newman, General Manager – Capital Delivery), notifying commencement of early works on 6 November 2024
30-May-25	Seqwater notification of commencement of the action to DCCEEW, Ref D25/103857 (Richard Plowes, Project Director), citing commencement on 26 May 2025, with transmittal email to DCCEEW Post Approvals
3-Jul-26	Seqwater notification to DCCEEW under Condition 21 (Nathan Carruthers, Senior Environmental Advisor), self-reporting a potential non-compliance in relation to the commencement date and the alignment of the Condition 20 and Condition 23 cycles

Independent audit - auditor nomination and criteria approval

Date	Document
30-Mar-26	DCCEEW approval of the nomination of Corey Brond, EWA Environmental Pty Ltd, as independent auditor (Condition 24(a))
28-Apr-26	Submission of the draft Audit Criteria and Methodology (EWA0050.1) to DCCEEW
24 February – 17 May 2026	DCCEEW, Seqwater and John Holland email chain, "EPBC 2017/8078 – Compliance Reporting and Independent Audit – amendment to draft audit criteria" [SEC=OFFICIAL], including the Department's requirement (11 May 2026) that Conditions 14 and 15 be actively assessed rather than rated Not Applicable
19-May-26	Submission of the amended Audit Criteria and Methodology (EWA0050.1, Rev 1) to DCCEEW

Date	Document
29-May-26	DCCEEW written approval of the audit criteria (Condition 24(b))

Adaptive Management Plan - Approval and Revision

Date	Document
7-May-25	DCCEEW letter, "Approval of revised Adaptive Management Plan for Six Mile Creek Dam Safety Upgrade Project (2017/8078)", approving AMP Revision 14 under Condition 26
1-Aug-25	Seqwater submission of the revised Adaptive Management Plan (Revision 15) to DCCEEW under Conditions 27 and 28
14-Aug-25	DCCEEW email (Alice Shields, Post Approvals), "RAMP Six Mile Creek Dam Safety Upgrade (2017/8078)" [SEC=OFFICIAL], confirming the submission adequately addresses Conditions 27 and 28 and that no further information is required
7-May-26	Seqwater letter to DCCEEW, "Submission of RAMP in accordance with Condition 27 & 28", Ref LMDIP-10000-GNL-PLA-LTR-00002 (D26/83705), submitting AMP Revision 16 for implementation not before 5 June 2026
11-May-26	DCCEEW acknowledgement of the Revision 16 submission