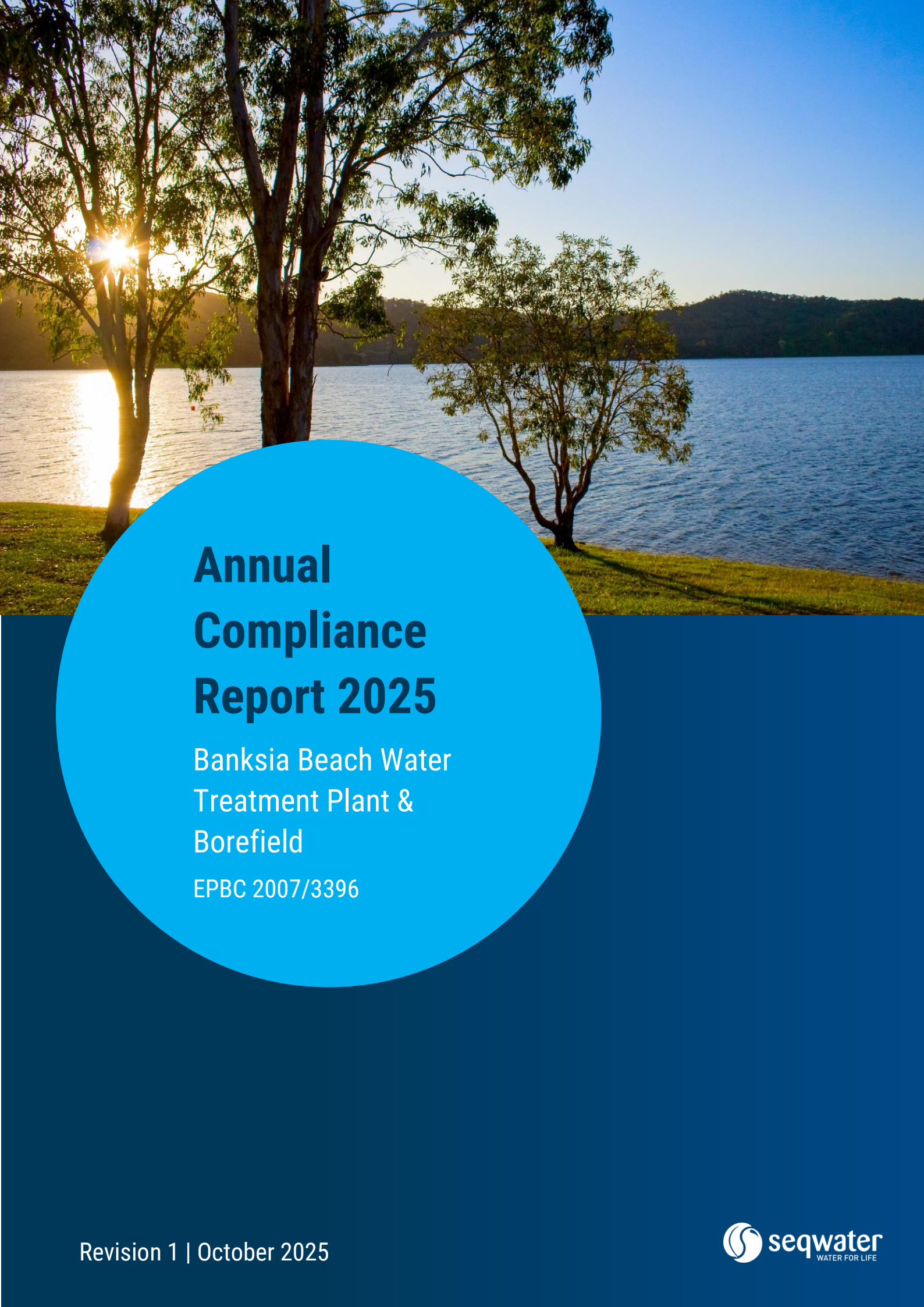




Annual Compliance Report 2025

Banksia Beach Water
Treatment Plant &
Borefield

EPBC 2007/3396

Distribution list

Name	Date
Seqwater Manager Operations Northern Region	04/11/2025
Seqwater Coordinator Supply Moreton and Somerset North	04/11/2025
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Date	Name	Position	Responsibility & Key Changes	Signature
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Date	Name	Position	Signature
31/10/2025	Greg Watkins	Manager Environment	Email approval (internal ref: (D25/211314))

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Glossary

Term	Definition
Approval Holder	The person to whom the approval is granted
AWS	Alert Weather Stations
BCAA	Brisbane Caboolture Aquifuture Alliance
BEMP	The Borefield Environmental Management Plan, as required under condition 2 and as amended in accordance with condition 4 or condition 5. The BEMP must include detailed management arrangements for ongoing ecological and groundwater monitoring, and reporting to the Department.
BOMP	The Borefield Operating Management Plan developed to provide early indicators of potential environmental impact through the setting of groundwater level and salinity trigger levels and accompanying management responses
CRG	Community Reference Group
DCCEEW	Department of Climate Change, Energy, the Environment, and Water
Department	The Australian Government Department responsible for administration of the <i>Environmental Protection and Biodiversity Conservation Act 1999</i> (Cth)
EPBC Act	<i>Environmental Protection and Biodiversity Conservation Act 1999</i> (Cth)
GDE	Groundwater Dependent Ecosystems that are dependent on continuous, seasonal or episodic access to groundwater either after or before it is expressed above the ground surface.
GDU	Groundwater Development Unit and refers to Bribie Island's large unconsolidated sand mass aquifers. provided water to the Banksia Beach Water Treatment Plant
Minster	The Minister responsible for administration of the <i>Environmental Protection and Biodiversity Conservation Act 1999</i> (Cth)
ML/d	Megalitres per day
MNES	Matters of National Environmental Significance
NDVI	Normalized Difference Vegetation Index
Northern AWS	National Park Alert Weather Stations
Northern Borefield	The area identified as the northern borefield in the BEMP
Northern SMP	Northern Soil Moisture Probe – positioned within the predicted shallow aquifer drawdown zone as the Impact impact Site site.
QPWS	Queensland Parks and Wildlife Services
Reporting period	1 September 2023 to 31 August 2024
SEQ	South East Queensland
Seqwater	Queensland Bulk Water Supply Authority
SMP	Soil Moisture Probe

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Southern SMP	Southern Soil Moisture Probe – positioned outside of the predicted shallow aquifer down zone as the control site. Control Site
WTP	Water Treatment Plant

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Executive Summary

This Annual Compliance Report summarizes the eleventh monitoring period for the Banksia Beach Water Treatment Plant (WTP) and Borefield under the approved Borefield Environmental Management Plan (BEMP), and covers the 1 September 2024 to 31 August 2025 reporting period. This report addresses compliance with the conditions set under the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval 2007/3396.

The BEMP encompasses multiple sub-monitoring programs, including the Aquifer Management Monitoring, Ecological Monitoring, and Meteorological Monitoring Programs. Seqwater has implemented internal procedures and protocols, including the Borefield Operating Management Plan (BOMP) and BEMP, to protect sensitive ecological communities and sustainably manage groundwater levels and quality.

Since the Banksia Beach WTP ceased operations in April 2014, no groundwater has been extracted from the borefield. Consequently, the BEMP was revised to reflect a reduced monitoring program for extended shutdown periods (shutdown > 12 months), referred to as cold standby. During cold standby, the Aquifer Management Monitoring Program is suspended, as there is no risk of seawater intrusion or groundwater depletion without extraction. The Ecological Monitoring Program was also refined in 2013 with the specific aim of establishing baseline vegetation conditions and determining the natural variations in vegetation structure, composition, and condition.

During the previous reporting period (2023-2024), Seqwater engaged an ecological consultant, 3D Environmental, to deliver the *Bribie Island Borefield Groundwater Dependent Ecosystems: Annual Vegetation Monitoring Report 2024* (*Annual Vegetation Monitoring Report 2024*). This report provided a detailed analysis of floristic, soil moisture, and meteorological data to evaluate vegetation conditions and seasonal variations at both sites. The analysis confirmed that a predictive ecological baseline has been established based on nine years (2016–2024) of data collected from 18 bi-annual vegetation transect surveys of the ‘groundwater-dependent’ wet heath community. The extensive dataset significantly improved the ability to predict the potential impacts of groundwater drawdown on the structure and function of groundwater-dependent ecosystems (GDE) and their resilience to climatic disturbances. The *Annual Vegetation Monitoring Report 2024* indicated that minor reductions in groundwater levels from borefield extractions are unlikely to cause any noticeable changes in the ecological state of the vegetation within the drawdown area in the short-term, with detectable impacts possible over decadal cycles. Notably, there was no evidence of ecological lag effects resulting from the groundwater abstraction that ceased in 2014.

Under the BEMP, the Ecological Monitoring Program is only required in cold standby until baseline vegetation conditions are established. Details on this determination are included in the 2024 Annual Compliance Report, submitted to the Department of Climate Change, Energy, the Environment, and Water (DCCEEW) on 28 November 2024. With the predictive ecological baseline now established, as confirmed in the *Annual Vegetation Monitoring Report 2024*, this subcomponent of the BEMP, which includes soil moisture and GDE vegetation monitoring, concluded at the end of last calendar year.

During this reporting period, Seqwater did not undertake any activities on Bribie Island that could significantly impact EPBC Act-listed species or Matters of National Environmental Significance (MNES).

Seqwater remains compliant with the EPBC 2007/3396 Conditions as outlined in [Section 4, Table 3](#).

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1. Introduction

The Queensland Government initiated a series of water infrastructure projects in response to the millennium drought and water supply challenges in South East Queensland (SEQ). In 2006, the *Water Regulation 2002* (Qld) was amended to include bulk water services supply objectives and provisions around Seqwater's water security program, to secure essential drinking water supplies for SEQ in anticipation of growing urban demand. This revision set a target to substitute 10 megalitres per day (ML/d) from the existing water supply system, with water sourced from Bribie Island's deep sand aquifer.

Subsequent aquifer and groundwater modelling studies revealed that sustainable production at the proposed Banksia Beach Water Treatment Plant (WTP) and the existing Woorim WTP was limited to 8 ML/d. Therefore, the proposed extraction rate was formally reduced to 5 ML/d in November 2007. The Banksia Beach WTP was designed for a maximum daily production of 5 ML/d and an annual daily average of 4.32 ML/d, not exceeding 1580 ML/year.

The Banksia Beach WTP and borefield were constructed and commissioned in 2007/2008 by the Brisbane Caboolture Aquifuture Alliance (BCAA). While the Woorim WTP was decommissioned in 2008 due to infrastructure and water quality issues. The Banksia Beach WTP ceased operations in April 2014 and remains in cold standby (shutdown >12 months).

1.1. Environmental Approvals

The proposed Banksia Beach WTP and borefield project was referred to the Department to determine whether the proposal constituted a controlled action requiring assessment under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act). The Department deemed that the project had the potential to significantly impact Matters of National Environmental Significance (MNES) protected under the EPBC Act; in particular, wetlands of international importance (s 16 and 17(b)). The project was formally declared a controlled action in May 2007 and opened for public comment per EPBC Act s95(a). Commonwealth approval was granted on 7 April 2008 (EPBC 2007/3396).

1.1.1. Environmental Management Plans

Under the approval conditions, the BOMP and the BEMP were implemented to protect ecological communities (e.g., Ramsar Wetland) and manage groundwater. The BEMP aims to ensure the long-term sustainability of the Groundwater Development Unit (GDU) and associated Groundwater Dependent Ecosystems (GDEs). The BEMP contains several monitoring programs, including the Aquifer Management Monitoring Program, the Ecological Monitoring Program, and the Meteorological Monitoring Program.

Following a 3-year detailed review, the Ecological Monitoring Program was refined in 2013 (approved April 2015) with a specific aim to establish baseline vegetation conditions and determine the natural range of variation that occurs across vegetation structure, composition, and condition. Since Seqwater has not extracted groundwater from the Banksia Beach Borefield since the Banksia Beach WTP ceased operations in April 2014, the BEMP was updated again in 2016 to reduce the monitoring program requirements during cold standby. The Aquifer Management Monitoring Program is not required during cold standby as there is no risk of seawater intrusion or groundwater depletion without extraction.

Minor reviews of the BEMP have occurred since, with the most recent amendment to discontinue Normalized Difference Vegetation Index (NDVI) data capture approved by the Department in May 2022.

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1.2. Purpose

Under EPBC 2007/3396 Condition 3, Seqwater is required to publish an Annual Compliance Report on its external website addressing the implementation of the BEMP. This Annual Compliance Report, covering the reporting period 1 September 2024 to 31 August 2025, is Seqwater's eleventh monitoring period for the Banksia Beach WTP and Borefield under the approved BEMP.

2. Current Status

2.1. Monitoring Requirements

In March 2016, the BEMP was amended to account for the cold standby shutdown (shutdown >12 months), which included:

- Suspending quarterly operational reports;
- Reducing Community Reference Group (CRG) meetings to specific issues;
- Suspending Aquifer Monitoring Program, including Standing Water Level and Electrical Conductivity monitoring;
- Suspending quarterly assessment of meteorological data.

During the 2021-2022 reporting period, the Department approved discontinuing NDVI data capture and analysis. This change was made because NDVI data was found to have no ongoing utility in assessing floristic composition or structural diversity in the wet heath habitats under consideration.

During the 2023-2024 reporting period a baseline for the Ecological Monitoring Program was established. The *Annual Vegetation Monitoring Report 2024* provided a detailed analysis of floristic, soil moisture, and meteorological data to evaluate vegetation conditions and seasonal variations at both sites. The analysis confirmed that a predictive ecological baseline had been established and therefore, this monitoring was not required during the 2024-2025 reporting period. See [Section 4.2](#) for further information.

Since the baseline has been established for the Ecological Monitoring Program, the Meteorological Monitoring Program is the only monitoring that was required during this reporting period. [Table 1](#) details the Meteorological Monitoring Program requirements.

Table 1. BEMP Meteorological Monitoring Program Requirements

	Monitoring Location / Data sources	Monitoring Type	Monitoring frequency
Weather Stations	Banksia AWS and Northern AWS	Temperature, Relative Humidity, Rainfall, Wind Speed, Wind Direction	Data compiled monthly
	Bureau of Meteorology (Redcliffe and Beerburum site)	Temperature, Relative Humidity, Rainfall, Wind Speed, Wind Direction	Recordings can be compiled for reporting via Bureau of Meteorology website

3. Compliance Designation

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The compliance designation against each Condition of the EPBC 2007/3396, *Variation to Conditions Attached to Approval Letter*, dated 10/04/2015, for this reporting period is provided in **Table 3**. It includes the compliance designation along with a summary of supporting evidence. Additional compliance details are available in the following sections. A description of the compliance designation terminology used in **Table 3** is provided in **Table 2**. These descriptions have been extracted from the Commonwealth of Australia [Annual Compliance Report Guidelines 2023](#).

Table 2. Compliance Designation Terminology Used in Table 3

Compliance Designation Term	Description
Compliant	Achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
Partial Non-compliance*	Designated when the requirements of a condition have been undertaken as specified, but minor interruptions occurred due to unforeseen circumstances, such as equipment failures. These interruptions are intermittent and do not substantially compromise the intent or objectives of the condition.
Non-compliant	Designated where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
Not Applicable	Designated where the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period.

*Designation included after the Department's Environmental Compliance Division advised Seqwater to report monitoring data gaps as partial non-compliance on 23/11/2023.

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4. EPBC 2007/3396 Compliance Table

Table 3. EPBC 2007/3396 Conditions of Compliance Table

Condition Number	Condition	Compliance Designation	Evidence / Comments
1	The approval holder must submit for approval by the Minister a BEMP designed to protect the ecological character of the Moreton Bay Ramsar wetlands. Once approved, the BEMP must be implemented. The approved BEMP must be published on the approval holder's website, with a location and/or metadata that enables easy discovery by relevant web searches, within one month of approval by the Minister . The approval holder must notify the Department within five business days of publishing the BEMP on its website. The BEMP must remain on the website for the period the approval has effect.	☒ Compliant ☐ Partial Non-compliance ☐ Non-compliant ☐ Not Applicable	The approved BEMP is available on Seqwater's website: Corporate Publications. See Section 4.1 for further details.
2	In accordance with the yield identified in the BEMP , the approval holder must limit groundwater extraction from the Northern Borefield to no greater than an annual average of 4.32ML/day, at a maximum daily rate of 5ML/day and totalling no more than 1580ML/year, subject to the requirements of conditions 1, 4 and 5.	☒ Compliant ☐ Partial Non-compliance ☐ Non-compliant ☐ Not Applicable	The Banksia Beach WTP has been in cold standby (>12 months) since April 2014, following the BEMP's monitoring and sampling regime. No borefield extraction occurred during this reporting period.
3	The approval holder must maintain accurate records of all measures taken to implement the BEMP according to the conditions of this approval, and must make these records available to the Department on request. Within 3 months of every anniversary of the commencement of the action, the approval holder must publish a Compliance Report on its website addressing implementation of the BEMP . The approval holder must also notify any non-compliance with this approval to the Department in writing within 10 business days of becoming aware of the non compliance. The approval holder must continue to annually publish the Compliance Report until such time as agreed in writing by	☒ Compliant ☐ Partial Non-compliance ☐ Non-compliant ☐ Not Applicable	This Annual Compliance Report satisfies the requirement to annually publish a Compliance Report within 3 months of the September 1 anniversary date and to notify the Department as no non-compliances were found to have occurred during the 2024-2025 reporting period. Further details on the implementation of the BEMP are provided in Section 4.2.

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	the Minister . Such records may be subject to audit by the Department or be used to verify compliance with the conditions of the approval.		
4	If the approval holder wishes to carry out any activity otherwise than in accordance with the BEMP , the person taking the action must submit to the Department for the Minister's written approval a revised version of the BEMP. The varied activity shall not commence until the Minister has approved the revised plan in writing. If the Minister approves the revised plan, that plan must be implemented in place of the plan originally approved. All revised plans approved by the Minister must be published on the approval holder's website within one month of their approval by the Minister .	☒ Compliant ☐ Partial Non-compliance ☐ Non-compliant ☐ Not Applicable	Following the Department's approval on 20/05/2022, the revised BEMP was implemented, with all active cold standby monitoring activities undertaken during this reporting period.
5	If the Minister believes that it is necessary or convenient for the better protection of the relevant matters of environmental significance to do so, the Minister may request the approval holder to make specific revisions to the BEMP and submit the revised plan for the Minister's written approval. Once approved, the revised plan must be implemented. Unless the Minister has approved the revised plan, the approval holder must continue to implement the originally approved BEMP , as specified in the conditions.	☐ Compliant ☐ Partial Non-compliance ☐ Non-compliant ☒ Not Applicable	No Ministerial requests for BEMP or approval amendments were received during this reporting period.
6	Upon the direction of the Minister , the approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister . The independent auditor and audit criteria must be approved by the Minister prior to the commencement of the audit. The audit report must address the criteria to the satisfaction of the Minister .	☐ Compliant ☐ Partial Non-compliance ☐ Non-compliant ☒ Not Applicable	No Ministerial requests for an independent audit were received during this reporting period.

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4.1. EPBC 2007/3396 Condition 1

Compliance Designation – Compliant

Following the *Variation to Conditions Attached to Approval Letter* in August 2015, Seqwater promptly implemented the BEMP, which was published on Seqwater’s website in September 2015.

The BEMP was later amended in March 2016 to incorporate changes related to the Banksia Beach WTPs cold standby shutdown (>12months). The revised BEMP was published on Seqwater’s website in March 2016.

In July 2021, Seqwater requested to remove the annual vegetation change assessment using remote sensing methods (NDVI image capture and analysis) from the approved BEMP. This request was granted by the Department on 20/05/2022 as part of BEMP Revision 13 (13/04/2021). The amended approved BEMP is available on Seqwater’s website: [Corporate Publications](#), as required by EPBC 2007/3396 Condition 1.

4.2. EPBC 2007/3396 Condition 3

Compliance Designation – Compliant

This Annual Compliance Report, covering the reporting period 1 September 2024 to 31 August 2025, fulfills the requirement under EPBC 2007/3396 Condition 3 to annually publish a Compliance Report within 3 months of the September 1 anniversary date and to notify the Department of any non-compliances. As no non-compliances occurred during this reporting period, this condition has been met.

4.2.1. Meteorological Monitoring (BEMP Requirement: Section 7.3)

Under EPBC 2007/3396 Condition 3, Seqwater must maintain accurate records of all measures undertaken to implement the BEMP, including the Meteorological Monitoring Program outlined in BEMP Section 7.3 (see [Table 1](#)).

4.2.2. Ecological Monitoring Program (BEMP Requirement: Section 7.2)

Under EPBC 2007/3396 Condition 3, Seqwater must maintain accurate records of all measures undertaken to implement the BEMP, including soil moisture data collection and GDE vegetation monitoring per the Ecological Monitoring Program outlined in BEMP Section 7.2.

Seqwater engaged 3D Environmental, a qualified ecological consultant, to conduct bi-annual vegetation transect surveys at the potential drawdown site (impact plot) and the control site. These surveys informed the *Annual Vegetation Monitoring Report 2024*, which provides a detailed analysis of floristic, soil moisture, and meteorological data to evaluate vegetation conditions and seasonal variations at both sites.

The *Annual Vegetation Monitoring Report 2024* confirms that a predictive ecological baseline has been established using a comprehensive dataset spanning nine years (2016–2024). This dataset includes structural and floristic data collected through 18 bi-annual vegetation transect surveys of the 'groundwater dependent' wet heath community.

The following key findings are summarised from the *Annual Vegetation Monitoring Report 2024* prepared by 3D Environmental:

- The current dataset captures several climatic drying and wetting cycles, providing valuable insights into potential changes in wet heath community floristic composition and structure due to reduced rainfall and associated soil drying. Importantly, despite groundwater abstraction ceasing in 2014, no evidence of

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resultant ecological lag effects has been observed. This includes the 2016 monitoring period, which recorded the highest initial species richness and woody stem counts during a long-term wetting trend.

- A clear link between rainfall, soil moisture, and positive impacts on species richness and woody stem counts has been identified, which suggests the establishment of a predictive ecological baseline. This baseline confirms that floristic diversity is strongly influenced by soil moisture, highlighting the potential for water extraction to negatively affect species diversity in the wet heaths of Bribie Island.
- The report indicates that minor reductions in groundwater levels from borefield extractions are unlikely to cause any noticeable changes in the ecological state of the vegetation within the drawdown area in the short-term, with detectable impacts possible over decadal cycles.
- The report concludes that intense wildfires, combined with reduced soil moisture and groundwater availability, exacerbate the severity of wildfire impacts on wet heathlands. Maintaining groundwater levels during drought periods is crucial for preserving the resilience of these communities against severe disturbances such as wildfires.

As such, this monitoring was suspended at the end of last calendar year in accordance with the cold standby requirements in Section 7.2 of the BEMP.

4.2.3. Community Reference Group

Under BEMP Section 4.2, Community Reference Group (CRG) meetings only occur when specific cold standby shutdown issues arise. No issues were raised by the CRG, nor did CRG meetings occur in this reporting period.

5. Conclusion

Seqwater has not extracted groundwater from the Banksia Beach Borefield since the Banksia Beach WTP ceased operations in April 2014. No activities were undertaken by Seqwater on Bribie Island during this reporting period that could significantly impact EPBC Act-listed species or MNES.

The Banksia Beach WTP has remained in cold standby for more than 10 years, and there are no current plans for reinstatement due to operational constraints, the substantial resources required for operational restoration, and the inability to use the asset for water supply or drought response augmentation. During this reporting period, the WTP’s ‘keep safe only’ maintenance status continued.

Based on long-term planning considerations, the WTP’s status, and the establishment of a predictive ecological baseline, as confirmed in the *Annual Vegetation Monitoring Report 2024*, the Ecological Monitoring Program was suspended at the end of last calendar year. This program, a subcomponent of the BEMP, includes soil moisture and GDE vegetation monitoring. Under the BEMP, the Ecological Monitoring Program is only required in cold standby (>12 months shutdown) until baseline vegetation conditions are established. Seqwater will continue all other cold standby monitoring activities in accordance with the BEMP.

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