



INDEPENDENT AUDIT

TRIESTE 3D SEISMIC SURVEY

FEBRUARY 2020
Report No. 01229F_1_v2



Beach Energy

Independent Audit – Trieste 3D Seismic Survey



February 2020
(Report No. 01229F_1_v2)

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1. Executive Summary

Beach Energy submitted a referral to undertake the Trieste 3D Seismic Survey under the *Environment Protection and Diversity Conservation Act 1999* in December 20017. The submission of a referral was undertaken on the basis that the seismic survey may have significant impacts on the Carnaby's black cockatoo. The project was determined a controlled action and assessment of the project was undertaken via the bilateral agreement with Western Australia. The project received EPBC approval with conditions on 11 October 2019.

A condition of approval was:

- ◆ The approval holder must ensure that independent audits of compliance with the conditions are conducted for the 12 month period from commencement of the action and for every subsequent 12 month period, or as otherwise requested in writing by the Minister.

ERIAS Group was engaged by Beach Energy to undertake an independent audit to determine compliance with conditions outlined in the approval EPBC 2017/8133. To determine compliance ERIAS Group undertook the following:

- ◆ Developed audit criteria and methodology which was approved by Department of Environment and Energy on 16 December 2019.
- ◆ Review of environmental documentation including Trieste 3D Seismic Survey Environment Plan, Oil Spill Contingency Plan – Trieste 3D Seismic Survey, Rehabilitation Assessment – Trieste 3D Seismic Project, Proposed Seismic Line Rehabilitation Monitoring Methodology, Trieste 3D Seismic Survey Mulching Verification Assessment, Conditions of approval issued by WA Department of Biodiversity Conservation and Attractions and a number of daily reports, registers etc. associated with the implementation of the seismic survey.
- ◆ A site inspection over 16-18 December 2019 which involved inspection of mulching being undertaken in the field including inspection of seismic lines that had already been mulched. The site inspection also involved review of project documentation and interviews with field personnel.

ERIAS Group developed 42 audit criteria which were based on the 13 EPBC Act approval conditions outlined in EPBC 2017/8133. The audit found that Beach Energy was in compliance with 19 of the criteria while a further 23 criteria were considered not applicable at the time of the audit. A number of the criteria which were considered not applicable relate to actions which have not yet commenced i.e. submission of annual compliance report or rehabilitation monitoring. No non compliances were identified.

Of particular note is that while approval was received to clear 74.54 ha the that actual area cleared was further reduced to 54.36 ha being cleared. The reduction in the area cleared was achieved by reduction in the width of standard receiver lines (actual 2.1m vs approval 2.5m) and source lines (actual 3.5 vs approval 4.0m). In addition, some seismic lines were not cleared as previously planned following completion of the cultural heritage survey and other project requirements.

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2. Auditor Certification

Auditor's name: David Browne

Position: Principal

Company: ERIAS Group

Contact details:

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Mobile: +61 419 012 698

Address: 22B Beulah Road, Norwood, SA, 5067

Auditor's Qualifications: BSc Natural Resources Management, University of Adelaide

Auditors Experience:

- ◆ 30 years environmental management experience in oil & gas, mining, infrastructure and agricultural sectors.

Auditor's declaration:

I, David Andrew Browne certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct and complete.

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



Signature

Date: 20 February 2020

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3. Introduction

Beach Energy through its subsidiary Lattice Energy operate the Beharra Springs Gas Facility and undertake exploration activities in the north Perth Basin. As part of its ongoing exploration program to provide additional gas reserves for the Beharra Springs Gas Facility, Beach Energy proposed to undertake the Trieste 3D Seismic Survey within Exploration Permit 320. The survey area is within the Geraldton Sandplains Bioregion.

The project is located approximately 13 km north of Eneabba and 40 km southeast of Dongara in Western Australia (Figure 3.1).

An *Environment Protection and Biodiversity Conservation Act 1999* referral was submitted to the Commonwealth Department of Environment and Energy on 22 December 2017 for a determination under the Act. The submission of a referral was undertaken on the basis that the seismic survey may have significant impacts on the Carnaby's black cockatoo. The project was determined to be a controlled action and was assessed under the bilateral agreement with Western Australia. The project was approved with conditions on 11 October 2019. One of the conditions of the approval was:

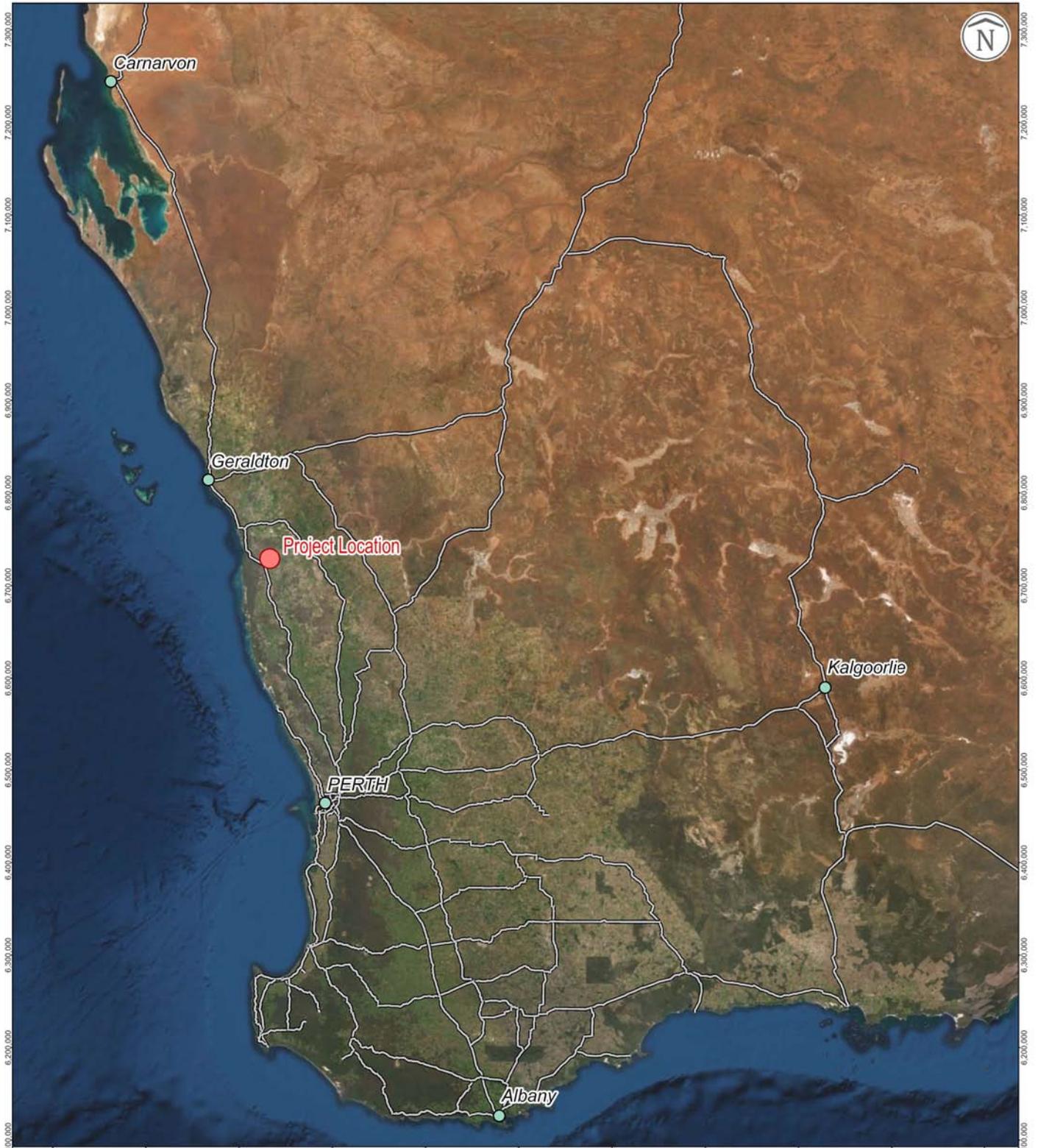
- ◆ Condition 10: The approval holder must ensure that independent audits of compliance with the conditions are conducted for the 12 month period from commencement of the action and for every subsequent 12 month period, or as otherwise requested in writing by the Minister.

This audit report has been prepared to meet the requirement of Condition 10. The audit was undertaken shortly after activities commenced as this was the period when disturbance of remnant native vegetation would occur.

PROJECT LOCATION OVERVIEW

Beach Energy Seismic Survey | Audit

FIGURE 3.1



SCALE: 1:6,000,000 @ A4



COORDINATE REFERENCE: GDA 1994 MGA Zone 50

- Project Location
- Towns
- Road

ERIAS Group 13-25 Church Street Hawthorn VIC 3122 Australia	Issue Date:	29.01.2020
	Map ID:	01229F_SS_GIS002_v0_3
	Figure Number:	01229F_SS_F03.1_GIS_v1
DATA SOURCE: Project data from Beach Energy, 2019. Base data from Beach Energy & GEODATA 250K, 2006. Imagery © ESRI, DigitalGlobe and Partners, 2019.		

4. Description of Activities

The Trieste 3D Seismic Survey covers an area of 217 km². Land use within this area includes cereal cropping, grazing and remnant native vegetation. This audit is focused on the portion of land that is remnant native vegetation which is Unallocated Crown Land (Figure 4.1). Project details are outlined in Table 4.1.

Table 4.1 – EPBC 2017/8133 Project Details

EPBC Number	EPBC 2017/8133
Date of Issue	11 October 2019
Expiry	1 September 2034
Project Name	Trieste 3D Seismic Survey
Approval Holder	Lattice Energy Limited
Approved Action	To undertake an onshore three-dimensional (3D) seismic survey near Eneabba in the north Perth basin, mapping geological formations to assist in the search for conventional gas reserves
Location of Project	Approximately 13km north of Eneabba within Exploration Permit EP320
Reporting Period	December 2019
Date of Audit	A site inspection was undertaken over 16-18 December 2019
Audit Methodology	Compliance with audit criteria was based on a site inspection and evidence collected during the inspection, interviews with personnel (both in the field and Beach Energy head office) review of field documents/data and review of various background documents
Date of Report	January 2020

4.1 Approvals

To undertake the Trieste 3D Seismic Survey Beach Energy obtained three key environmental approvals (Table 4.2). These approvals are in addition to environmental requirements outlined in EP320.

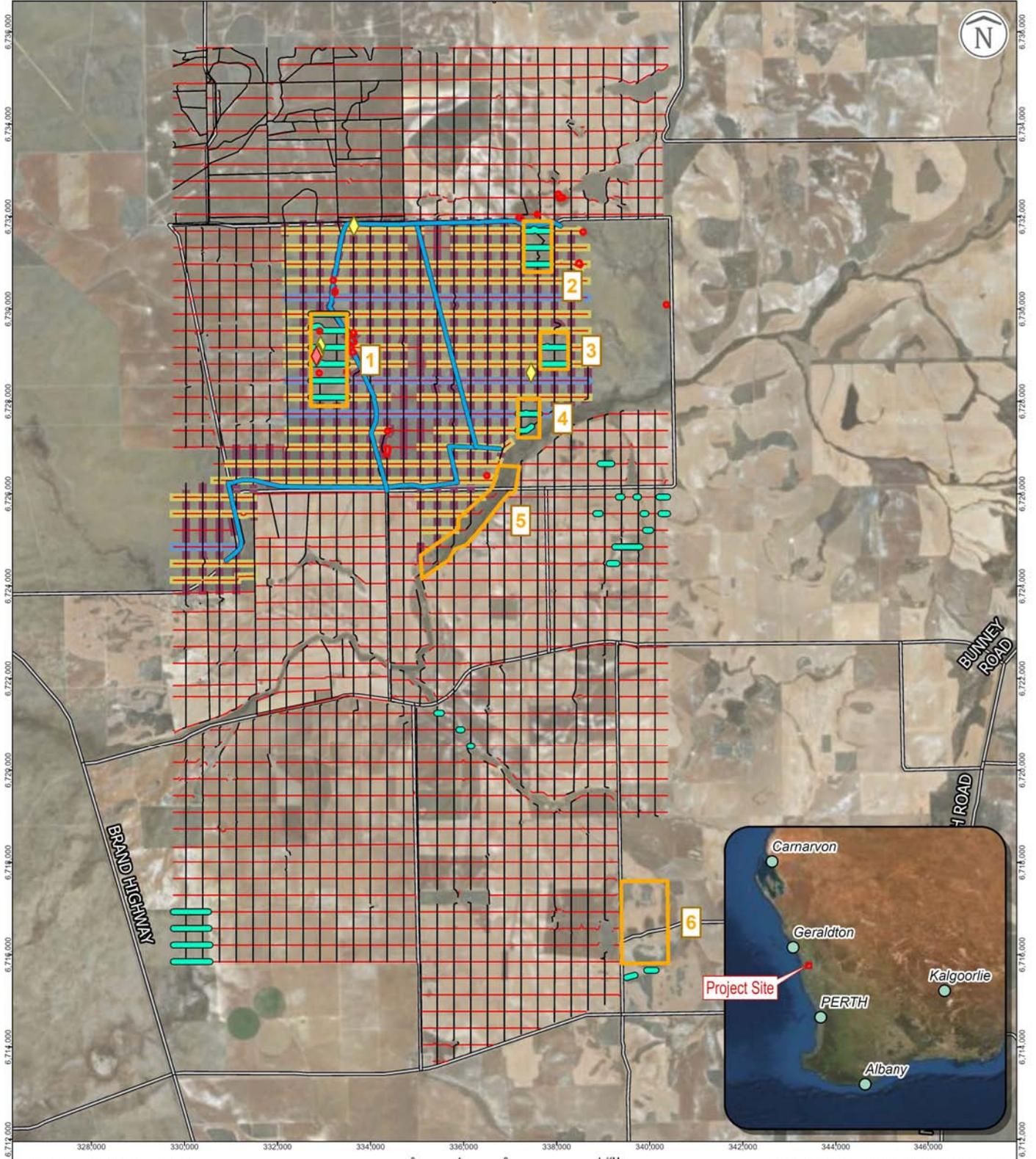
Table 4.2 – EPBC 2017/8133 Project Details

Approval	Details	Date of Issue	Expiry
EPBC 2017/8133	Undertake an onshore three-dimensional (3D) seismic survey	11 October 2019	1 September 2034
Clearing Permit 817/1	Clearing of not more than 74.539 ha of native vegetation	9 May 2019	31 May 2024
Authorisation to Take or Disturb Threatened Species TFL 53-1819	Authorisation to inadvertently take or disturb threatened species	10 May 2019	30 May 2024

SEISMIC SURVEY LINES, CULTURAL HERITAGE SITES AND EXCLUSION ZONES

Beach Energy Seismic Survey | Audit

FIGURE 4.1



SCALE: 1:120,000 @ A4

0 1 2 4 KM

COORDINATE REFERENCE: GDA 1994 MGA Zone 50

- | | | |
|--------------------|--------------------------------|------------------------------------|
| — Road | — Cultural heritage hand carry | — Cultural heritage exclusion zone |
| — Inspection Route | — Mulching Source (v5) | — Threatened flora 50m Buffer |
| — Source line | — Mulching Receiver (v6) | Cultural Heritage Artefacts |
| — Receiver line | — Mulching 4m | ◆ Manuport |
| | | ◆ Grindstone Fragment |

Issue Date: 29.01.2020
 ERIAS Group
 13-25 Church Street
 Hawthorn VIC 3122
 Australia
 Map ID: 01229F_SS_GIS001_v0_4
 Figure Number: 01229F_SS_F04.1_GIS_v1
 DATA SOURCE:
 Project data from Beach Energy, 2019.
 Base data from Beach Energy & GEODATA 250K, 2006.
 Imagery © ESRI, DigitalGlobe and Partners, 2019.

5. Details of Compliance with EPBC 2017/8133 Approval Conditions

5.1 EPBC 2017/8133 Approval Condition 1

Approval Condition: The approval holder must not clear more than 74.539 ha of foraging habitat for the Carnaby's black cockatoo within the survey boundary (map at Attachment A).

Table 5.1 – Approval Condition 1

1	EPBC 2017/8133 Condition	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
1.1	Criteria: Demonstrate by as completed survey data that vegetation clearing of foraging habitat for the Carnaby's black cockatoo has not exceeded 74.539 ha.	On-site inspection of proposed habitat clearing vs actual habitat clearing. Inspect of Beach Energy vegetation clearance documentation and verification during site inspection. Check GIS mapping of as surveyed data.	GPS coordinates of each seismic line are entered into a navigation system which is used on the mulcher (Plate 1). The navigation system records where the mulcher has operated, and Terrex provide this data to Beach Energy on a daily basis. The data is analysed according to type of line mulched as the width varies (Source line 3.5m (Plate 2) and Standard Receiver line 2.1m (Plate 3) and Double Receiver line 4.0m) and this data is then used to calculate the area cleared according to source or receiver lines. Data is reported daily in the Daily Report together with a cumulative total. Terrex then survey every 20m along each source and receiver line.	Site inspection by D Browne 17 December 2019. Daily Report Trieste 3D 15 December 2019.pdf Prepared by Bruce Mitchell (Beach Energy Senior Field Manager) Email 19/12/19 from P Black to T Stehbens confirming that spot checks completed. Trieste 3D Seismic Survey - Mulching Verification Assessment report (February 2020).	An electronic system has been implemented to guide the mulcher to ensure that mulching is only undertaken in accordance with the planned seismic survey. Data collected is analysed daily to determine area cleared and accumulative data. The survey was initially planned based on Source lines being 4m wide and Receiver lines 2.5-4m wide. The actual width of Source lines has been reduced to 3.5m and Standard Receiver lines 2.1m and Double Receiver lines 4.0m.	Compliance

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Table 5.1 – Approval Condition 1 (cont'd)

1 (c)	EPBC 2017/8133 Condition (cont'd)	Verification Method (cont'd)	Evidence (cont'd)	Documents Sighted (cont'd)	Determination (cont'd)	Compliance Finding (cont'd)
1.1			At the commencement of mulching activities Source and Receiver lines were physically measured by Beach Energy personnel (and follow-up spot checking was also undertaken by Peter Black (on site Field Environmental Advisor) confirming width of Source and Receiver lines consistent with checks undertaken at commencement of program.		Beach Energy verification report used as complete GIS data combined with field measurements and found that the area cleared for the project was 54.36 ha against the approved project clearing footprint of 74.54 ha.	

5.2 EPBC 2017/8133 Approval Condition 2

Approval Condition: To minimise the impacts of the action on EPBC Act listed species, the approval holder must implement condition 8 of the Western Australian Clearing Permit (8171/1) for the life of the approval from the commencement of the action.

Table 5.2 – Approval Condition 2

2	EPBC 2017/8133 Condition 2	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
2.1	Criteria (a) When undertaking any clearing or other activity authorised under this Permit, the Permit Holder must take the following steps to minimise the risk of the introduction and spread of weeds and dieback:	Documentation which demonstrates equipment was inspected and was clean of soil and vegetation before arriving on site.	Weed Hygiene certificates for prestart and in field. Photographs of mulcher being blown down (Plates 4 and 5) and Weed Hygiene certificates for mulcher and 4WD entering private property	A sample of weed hygiene declaration certificates were reviewed including the following: 1 Central Earthmoving Weed Hygiene Declaration.tif 2 Central Earthmoving Weed Hygiene Declaration.tif 3 Central Earthmoving Weed Hygiene Declaration.tif 4 Central Earthmoving Weed Hygiene Declaration.tif	Both Beach Energy personnel and Terrex personnel have a high awareness of the importance of hygiene. The issue was a focus of the induction and was discussed during a prestart meeting attended by the auditor in relation to the need to clean down the mulcher when moving from mulching remnant native vegetation within the	Compliance

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Table 5.2 – Approval Condition 2 (cont'd)

2 (c)	EPBC 2017/8133 Condition 2 (cont'd)	Verification Method (cont'd)	Evidence (cont'd)	Documents Sighted (cont'd)	Determination (cont'd)	Compliance Finding (cont'd)
2.1	(i) clean earth-moving machinery of soil and vegetation prior to entering and leaving the area to be cleared.			1ETV518 - Weed Declaration_20191128.pdf 1GWQ871 - Weed Declaration_20191207.pdf 320SXX - Weed Declaration_20191128.pdf 484XPU - Weed Declaration_20191128.pdf 1GWY307 - Weed Declaration_20191128.pdf Weed Hygiene Certificate 17Dec19.jpg Weed Hygiene Certificate Mulcher 17Dec19.jpg	Unallocated Crown Land to a Private property.	
2.2	Criteria: (a) When undertaking any clearing or other activity authorised under this Permit, the Permit Holder must take the following steps to minimise the risk of the introduction and spread of weeds and dieback: (ii) ensure that no dieback or weed-affected soil, mulch, fill or other material is brought into the area to be cleared.	Documentation which certifies that any soil, mulch, fill or other material brought onto site was clean of dieback or weeds.	Site inspection did not identify any soil, mulch, fill or other material that had been imported to the site. Peter Black (Field Environmental Advisor) confirmed that no material has been brought onto site nor is any planned.	Not applicable as no material has been brought onto site.	Beach Energy nor its contractor Terrex has brought any soil, mulch, fill or other material onto site.	Compliance

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Table 5.2 – Approval Condition 2 (cont'd)

2 (c)	EPBC 2017/8133 Condition 2 (cont'd)	Verification Method (cont'd)	Evidence (cont'd)	Documents Sighted (cont'd)	Determination (cont'd)	Compliance Finding (cont'd)
2.3	Criteria: (a) When undertaking any clearing or other activity authorised under this Permit, the Permit Holder must take the following steps to minimise the risk of the introduction and spread of weeds and dieback: (iii) restrict the movement of machines and other vehicles to the limits of the areas to be cleared.	Visual observations during site inspection.	Vehicles in unallocated crown land are restricted to existing fire access tracks. Mulching machine and fire support ute access the seismic lines. Auditor did not observe any evidence that vehicles were outside approved areas.	Not applicable.	The site inspection covered an extensive area of the Unallocated Crown Land that was being mulched for Source and Receiver lines. During the site inspection there was no evidence that vehicles had travelled off access tracks. Note that even travelling along lines that have been mulched posed a high risk of puncturing a tyre.	Compliance
2.4	Criteria: (a) When undertaking any clearing or other activity authorised under this Permit, the Permit Holder must take the following steps to minimise the risk of the introduction and spread of weeds and dieback: (iv) only move soils in dry conditions	Visual observations during site inspection.	Auditor did not observe and Peter Black (Field Environment Advisor) confirmed that no soil has been bought or moved onto site nor is any planned.	Not applicable.	Only mulching activities have been undertaken to date and there has been no requirement to move soil nor is it expected that there will be a requirement to move soil during the duration of the project.	Compliance

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Table 5.2 – Approval Condition 2 (cont'd)

2 (c)	EPBC 2017/8133 Condition 2 (cont'd)	Verification Method (cont'd)	Evidence (cont'd)	Documents Sighted (cont'd)	Determination (cont'd)	Compliance Finding (cont'd)
2.5	Criteria: (a) When undertaking any clearing or other activity authorised under this Permit, the Permit Holder must take the following steps to minimise the risk of the introduction and spread of weeds and dieback: (v) where dieback or weed-affected soil, mulch, fill or other material is to be removed from the area to be cleared, ensure it is transferred to areas of comparable soil disease status.	Confirm whether material has been removed from the area cleared through review of Beach Energy documentation relating to earthworks approval. If material has been removed inspection of area where relocated. Review documentation retesting of material moved re whether dieback or weed affected and status at new location.	No material was observed by the auditor to have been removed from the area cleared. This was confirmed by Peter Black (Field Environmental Advisor)	Not applicable.	No soil, mulch, fill or other material has been removed from the area being mulched.	Compliance
2.6	Criteria: (b) At least once in each 12 month period for the term of this Permit, the Permit Holder must remove or kill any weeds growing within areas cleared under this Permit.	Review inspection reports re presence of weeds in areas cleared. Inspect areas where weed control has been implemented.	Hygiene inspection certificates were observed for equipment being used.	1 Central Earthmoving Weed Hygiene Declaration.tif 2 Central Earthmoving Weed Hygiene Declaration.tif 3 Central Earthmoving Weed Hygiene Declaration.tif 4 Central Earthmoving Weed Hygiene Declaration.tif 1ETV518 - Weed Declaration_20191128.pdf 1GWQ871 - Weed Declaration_20191207.pdf 320SXX - Weed Declaration_20191128.pdf 484XPU - Weed Declaration_20191128.pdf	Project activities commenced in late November 2019 with mulching commencing in December 2019. Since commencing the project there has been no rainfall.	Not applicable

Table 5.2 – Approval Condition 2 (cont'd)

2 (c)	EPBC 2017/8133 Condition 2 (cont'd)	Verification Method (cont'd)	Evidence (cont'd)	Documents Sighted (cont'd)	Determination (cont'd)	Compliance Finding (cont'd)
2.6 (c)				1GWY307 - Weed Declaration_20191128.pdf Weed Hygiene Certificate 17Dec19.jpg Weed Hygiene Certificate Mulcher 17Dec19.jpg No inspection reports have been prepared at this time as project had just commenced at time of site inspection.		

5.3 EPBC 2017/8133 Approval Condition 3

Approval Condition: To minimise the impacts of the action on foraging habitat for the Carnaby's black cockatoo, the approval holder must implement condition 10 (relating to rehabilitation) of the Western Australian Clearing Permit (8171/1). The object of rehabilitation works is to re-establish a self-sustaining vegetation cover, integrated with the surrounding ecosystem, providing foraging habitat for the Carnaby's black cockatoo.

- a. The approval holder must continue rehabilitation works until the Department has provided written acceptance of a report by a suitably qualified person certifying and providing evidence that all of the completion criteria have been met.
- b. Following submission to the Department of the certified report demonstrating that the completion criteria have been achieved in accordance with condition 3(a), the suitably qualified expert must monitor the rehabilitation area at least once every two years, during spring, for the life of the approval with sufficient effort to reliably ascertain whether the completion criteria continue to be met or exceeded.
- c. If the monitoring undertaken in accordance with condition 3(b) determines that any of the completion criteria are no long being met, the approval holder must, within 3 months of becoming aware that any of the completion criteria are no longer being met, commence undertaking corrective actions and continue these until the Department has provided written acceptance of a report by a suitably qualified person certifying and providing evidence that all the completion criteria have been met.

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Table 5.3 – Approval Condition 3

3	EPBC 2017/8133 Condition 3	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
3.1	Criteria: Retain the vegetative material removed by clearing.	Site inspection	Vegetative material was mulched in-situ (Plate 6).	Not applicable	Mulching of seismic lines was shown to be very effective with no material being removed and all vegetation remaining in-situ.	Compliance
3.2	Criteria: Stockpile cleared vegetative material in an area that has been cleared.	Site inspection	No stockpiling of vegetative material has been undertaken.	Not applicable	No stockpiling of vegetation has been required.	Compliance
3.3	Criteria: Within 12 months following clearing commence revegetation.	Site inspection		Not applicable	Condition not applicable at time of inspection	Not applicable
3.4	Criteria: Laying the vegetative material retained and stockpiled.	Site inspection	Vegetative material was mulched in-situ.	Not applicable	As the source and receiver lines were mulched there was no requirement to layer retained and stockpiled vegetation	Not applicable
3.5	Criteria: Implement adequate measures to prevent third party access to survey lines and access tracks.	Site inspection	Within 20m of public roads the mulcher was raised so that third party access is not encouraged. As the area is mulched the terrain is difficult and does not encourage third parties as the likelihood of puncturing a tyre is high due to the numerous sticks that protrude after the mulching. In a limited number of occasions, the mulcher was not raised, and mulching occurred up to the fire access track. This issue was observed on the first day that mulching occurred and had not occurred since.		Management practices have been implemented to prevent third party access. These include: <ul style="list-style-type: none"> • Entering information into GPS to mark seismic lines and access tracks which identifies when mulcher is to be lifted (Plate 1). • Lifting of mulcher 20m before Public roads (Plate 7). Beach Energy also intend to erect signs stating 'Rehabilitation in Progress' at selected seismic lines once the program is complete.	Compliance

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Table 5.3 – Approval Condition 3 (cont'd)

3 (c)	EPBC 2017/8133 Condition 3 (cont'd)	Verification Method (cont'd)	Evidence (cont'd)	Documents Sighted (cont'd)	Determination (cont'd)	Compliance Finding (cont'd)
3.6	Criteria: Conduct monitoring at a minimum of once every 2 years in accordance with the document 'Mattiske, 2018. Proposed Seismic Line Rehabilitation Monitoring Methodology, Beharra Springs. Prepared by Mattiske Consulting Pty Ltd for Beach Energy, October 2018'.	Review monitoring reports Inspect monitoring sites during field inspection.				Not applicable
3.7	Criteria: Submit to the Department certified report demonstrating that completion criteria have been achieved.	Review of certified monitoring report.				Not applicable
3.8	Criteria: If completion criteria are not being met, within 3 months submit a report detailing the corrective actions to be taken.	Report submitted to Department.				Not applicable

Table 5.3 – Approval Condition 3 (cont'd)

3 (c)	EPBC 2017/8133 Condition 3 (cont'd)	Verification Method (cont'd)	Evidence (cont'd)	Documents Sighted (cont'd)	Determination (cont'd)	Compliance Finding (cont'd)
3.9	Criteria: Continue rehabilitation monitoring until it can be demonstrated (certified report) that completion criteria have been achieved.	Letter from Department stating it has accepted report and completion criteria have been achieved.				Not applicable

5.4 EPBC 2017/8133 Approval Condition 4

Approval Condition: To compensate for the loss of up to 74.539 ha of foraging habitat for the Carnaby's black cockatoo, the approval holder must:

- a. Within one year of the commencement of the action submit to the Minister for approval:
 - i. Details of an offset that includes a minimum of 218.46 ha of foraging habitat for the Carnaby's black cockatoo. The approval holder must demonstrate that the proposed offset meets the principles of the Department's EPBC Environmental Offsets Policy
 - ii. An Offset Management Plan for the proposed offset provided in accordance with condition 4(a)(i). The Offset Management Plan must include time-bound performance targets, completion criteria, details of a monitoring program, management actions, corrective actions and triggers for corrective actions to be undertaken in the event that performance targets have not been met.
- b. Within two years of the commencement of the action, provide written evidence to the Department that a financial contribution of at least \$104,860.80 has been made to an approved conservation fund for the purchase and ongoing management of the approved offset required by condition 4(a).
- c. Provide the Department with the offset attributes, shapefiles, textual descriptions and maps to clearly define the location and boundaries of the offset site(s).

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Table 5.4 – Approval Condition 4

4	EPBC 2017/8133 Condition 4	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
4.1	Criteria: Offset which meets the principles of the Departments EPBC Environmental Offsets Policy	Documentation of: - Review of Offset Management Plan and supporting information - Letter or similar from Department approving Offset Management Plan		Environmental offset strategy, Trieste seismic survey project, March 2018t. Report prepared by RPS.		Not applicable
4.2	Criteria: Offset Management Plan containing: Time bound performance targets Completion criteria Monitoring program Management actions Corrective actions Triggers for corrective actions	Documentation of: - Review of Offset Management Plan and supporting information - Letter or similar from Department approving Offset Management Plan		Environmental offset strategy, Trieste seismic survey project, March 2018t. Report prepared by RPS.		Not applicable
4.3	Criteria: Payment of \$104,860.80 to an approved conservation fund for the purchase and ongoing management of the offset	Receipt of payment of \$104,860.80	Receipt from Department of Water and Environmental Regulation provided to auditor	RPO14025_RI002480_Acc.of Lattice Energy Resources Perth. pdf	Payment of the offset was made on 31 May 2019 in the amount of \$104,860.80.	Compliance

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Table 5.4 – Approval Condition 4 (cont'd)

4 (c)	EPBC 2017/8133 Condition 4 (cont'd)	Verification Method (cont'd)	Evidence (cont'd)	Documents Sighted (cont'd)	Determination (cont'd)	Compliance Finding (cont'd)
4.4	Criteria: Provide the Department with the offset attributes, shapefiles, textual descriptions and maps to clearly define the location and boundaries of the offset site(s).	Review of documentation which indicates the transfer of data has occurred.				Not applicable

5.5 EPBC 2017/8133 Approval Condition 5

Approval Condition: The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.

Table 5.5 – Approval Condition 5

5	EPBC 2017/8133 Condition 5	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
5.1	Criteria: Record of notification within 10 business days after commencement of the action.	Letter or similar notifying Department of commencement of the action.	Letter from Department of Environment and Energy acknowledging advice by Beach Energy on 5 December 2019 of commencement of the action.	2017-8133_Signed Letter_Commencement of Action Acknowledgement.pdf	Beach Energy advised the Department that it had commenced the seismic survey on 5 December 2019. This was 2 days after works had commenced and within the requirement to notify the Department within 10 business days after commencement of the action.	Compliance

5.6 EPBC 2017/8133 Approval Condition 6

Approval Condition: If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without prior written agreement of the Minister.

Table 5.6 – Approval Condition 6

6	EPBC 2017/8133 Condition 6	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
6.1	Criteria: Agreement from Minister if commencement of the action does not occur within 5 years.	Letter or similar demonstrating that Minister has agreed to commencement of the action if greater than 5 years since approval.				Not applicable

5.7 EPBC 2017/8133 Approval Condition 7

Approval Condition: The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or as otherwise agreed to in writing by the Minister. The approval holder must:

- a. Publish each compliance report on the website within 20 business days following the relevant 12 month period;
- b. Notify the Department by email that a compliance report has been published on the website within five business days of the date of publication, and provide a link to the published report;
- c. Keep all compliance reports publicly available on the website until this approval expires;
- d. Exclude or redact sensitive ecological data from compliance reports published on the website; and
- e. Where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication.

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Table 5.7 – Approval Condition 7

7	EPBC 2017/8133 Condition 7	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
7.1	Criteria: Prepare annual compliance report by 11 October 2020 and thereafter each year until 2034.	Review annual compliance report.				Not applicable
7.2	Criteria: Publish on Beach Energy's website the annual compliance report by end of October each year.	Check Beach Energy website.				Not applicable
7.3	Criteria: Within 5 days of annual compliance report being placed on the Beach Energy website notify the Department that the compliance report has been released to the public.	Sent email confirming date that Department was notified and containing link to report on Beach Energy website.				Not applicable
7.4	Criteria: Keep all compliance reports on website until 2034.	Check Beach Energy website.				Not applicable

Table 5.7 – Approval Condition 7 (cont'd)

7 (c)	EPBC 2017/8133 Condition 7 (cont'd)	Verification Method (cont'd)	Evidence (cont'd)	Documents Sighted (cont'd)	Determination (cont'd)	Compliance Finding (cont'd)
7.5	Criteria: Exclude or redact sensitive ecological data from compliance reports published on website.	Check of website to identify areas of redacted text.				Not applicable
7.6	Criteria: Within 5 days of annual compliance report being placed on the Beach Energy website provide the Department with a copy of the compliance report without the redacted text.	View email and/or letter sent to Department.				Not applicable

5.8 EPBC 2017/8133 Approval Condition 8

Approval Condition: The approval holder must notify the Department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify:

- a. The condition which is or may be in breach;
- b. A short description of the incident and/or non-compliance; and
- c. The location (including co-ordinates), date and time of the incident and/or non-compliance

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Table 5.8 – Approval Condition 8

8	EPBC 2017/8133 Condition 8	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
8.1	Criteria: Report within 2 business days any incident specifying: - the condition which is or may be in breach - a short description of the incident and/or non-compliance and - the location (including co-ordinates), date and time of the incident and/ or non-compliance	Incident report Email or letter to Department advising of incident.		Incident report ID 1175 (20191204 – Oil Spill – Beach.pdf Incident report ID 1176 (20191207 – Oil Spill – Beach.pdf	At the time of the site inspection no incident had occurred which would be considered a breach of any condition	Compliance
8.2	Criteria: Report within 2 business days any non-compliance with conditions specifying: - the condition which is or may be in breach - a short description of the incident and/or non-compliance and - the location (including co-ordinates), date and time of the incident and/ or non-compliance	Email or letter to Department advising of non-compliance.			At the time of the site inspection no non-compliance had occurred which would be considered a breach of any condition	Compliance

Table 5.8 – Approval Condition 8 (cont'd)

8 (c)	EPBC 2017/8133 Condition 8 (cont'd)	Verification Method (cont'd)	Evidence (cont'd)	Documents Sighted (cont'd)	Determination (cont'd)	Compliance Finding (cont'd)
8.3	<p>Criteria: Report within 2 business days any non-compliance with commitments made in plans specifying:</p> <ul style="list-style-type: none"> - the condition which is or may be in breach - a short description of the incident and/or non-compliance and - the location (including co-ordinates), date and time of the incident and/ or non-compliance 	<p>Email or letter to Department advising of noncompliance with plans.</p>	<p>A review of all commitments within the environmental management plan (EMP) prepared for the Trieste seismic program was completed by the auditor. A total of 156 commitments were identified in the EMP (note that not all commitments were applicable at the time of the audit).</p>	<p>Lattice_Trieste_EP_Rev 5 CLEAN.pdf</p>	<p>Beach Energy was found to be in compliance with the majority of commitments with the following minor exceptions which were considered a partial compliance:</p> <ul style="list-style-type: none"> • EP033 Permit to handle fauna obtained under the WA Biodiversity Conservation Act 2016. The Field Environmental Advisor has a fauna handling permit issued under the Queensland Nature Conservation (Administration) Regulation 2006. Note that the WA Department of Mines, Industry Regulation and Safety did not consider this a non-compliance). • EP065 Clean down facilities for vehicles and footwear to be available at the laydown sites. Auditor noted blow down occurring (Plate 4) however facilities were not available for footwear. Prior to leaving site a new daily procedure had been implemented re checking that boots were clean each day. 	<p>Compliance</p>

5.9 EPBC 2017/8133 Approval Condition 9

Approval Condition: The approval holder must provide to the Department the details of an incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:

- a. Any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;
- b. The potential impacts of the incident or non-compliance; and
- c. The method and timing of any remedial action that will be undertaken by the approval holder.

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Table 5.9 – Approval Condition 9

9	EPBC 2017/8133 Condition 9	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
9.1	Criteria: Report within 10 business days details of incident specifying: - any corrective action or investigation taken or intended - potential impact of the incident - method and timing of remedial action	Review of incident report and investigation. Interview with personnel involved or who undertook investigation. Review of documentation regard method of remedial action.	A review of incidents reported since the project was undertaken. A total of two incidents were recorded both involving spills of very small quantities of oil (both less than 300ml).	Incident report ID 1175 (20191204 – Oil Spill – Beach.pdf) Incident report ID 1176 (20191207 – Oil Spill – Beach.pdf)	No incident with the conditions or commitments made in plans has been reported.	Compliance
9.2	Criteria: Report within 10 business days details of non-compliance specifying: - any corrective action or investigation taken or intended - potential impact of the non-compliance - method and timing of remedial action	Review of non-compliance reporting. Review of investigation. Review documentation regarding method of remedial action.	A review of incidents reported since the project was undertaken. A total of two incidents were recorded both involving spills of very small quantities of oil (both less than 300ml).	Incident report ID 1175 (20191204 – Oil Spill – Beach.pdf) Incident report ID 1176 (20191207 – Oil Spill – Beach.pdf)	No non-compliance with the conditions or commitments made in plans has been reported.	Compliance

5.10 EPBC 2017/8133 Approval Condition 10

Approval Condition: The approval holder must ensure that independent audits of compliance with the conditions are conducted for the 12 month period from commencement of the action and for every subsequent 12 month period, or as otherwise requested in writing by the Minister.

Table 5.10 – Approval Condition 10

10	EPBC 2017/8133 Condition 10	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
10.1	Criteria: Independent audits are conducted to assess compliance with the conditions annually from commencement of the action and for every subsequent 12 month period.	Review audit reports prepared by Independent Auditor.				Not applicable

5.11 EPBC 2017/8133 Approval Condition 11

Approval Condition: For each independent audit, the approval holder must:

- a. Provide the name and qualifications of the independent auditor and the draft audit criteria to the Department;
- b. Only commence the independent audit once the audit criteria have been approved in writing by the Department; and
- c. Submit an audit report to the Department within the timeframe specified in the approved audit criteria.

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Table 5.11 – Approval Condition 11

11	EPBC 2017/8133 Condition 11	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
11.1	Criteria: Provide name and qualifications of Independent auditor to the Department.	Review letter or email.	Beach Energy nominated an independent auditor in a letter to DEE dated 28 November 2019.	Letter from DEE to Beach Energy (EPBC 2017-8133 – Letter approving auditor.pdf)	DEE responded on 6 December 2019 approving the appointment of the independent auditor.	Compliance
11.2	Criteria: Provide draft audit criteria to the Department.	Review letter or email.	Beach Energy submitted the draft audit criteria developed by ERIAS Group to DEE on 13 December 2019 for approval.	Letter from DEE to Beach Energy (EPBC 2017-8133 – Letter approving audit criteria.pdf)	DEE provided approval of the draft audit criteria on 16 December	Compliance
11.3	Criteria: Commence Independent Audit following approval for the audit criteria from the Department.	Compare dates of when Independent Audit was undertaken and when approval received from Department.	The site inspection was undertaken on 17 December 2019.	Letter from DEE to Beach Energy (EPBC 2017-8133 – Letter approving audit criteria.pdf)	The site inspection using the approved audit criteria was undertaken the day following approval by DEE.	Compliance
11.4	Criteria: Independent Audit report submitted within timeframe specified in audit criteria.	Review date of submission of Independent Audit report vs timeframe specified in audit criteria.				Not applicable at time of preparing audit report

5.12 EPBC 2017/8133 Approval Condition 12

Approval Condition: The approval holder must publish the audit report on the website within 10 business days of receiving the Department’s approval of the audit report and keep the audit report published on the website until the end date of this approval.

Table 5.12 – Approval Condition 12

12	EPBC 2017/8133 Condition 12	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
12.1	Criteria: Publish audit report on website within 10 days of receiving the Departments approval of the audit report.	Electronic data records indicating date report was published on website and date report was approved.				Not applicable
12.2	Criteria: Audit reports remain on website until end date of approval.	Review of website to confirm that audit reports remain.				Not applicable

5.13 EPBC 2017/8133 Approval Condition 13

Approval Condition: Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.

Table 5.13 – Approval Condition 13

13	EPBC 2017/8133 Condition 13	Verification Method	Evidence	Documents Sighted	Determination	Compliance Finding
13.1	Criteria: Advise Department in writing within 30 days after completion of the action.	Review of Letter.				Not applicable
13.2	Criteria: Provide Department with completion data.	Review of completion data.				Not applicable

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6. Plates

Plate 1: GPS navigation system used on mulcher indicating where mulching (green rectangle shape) is to occur. Note that when approaching a road no mulching is undertaken.

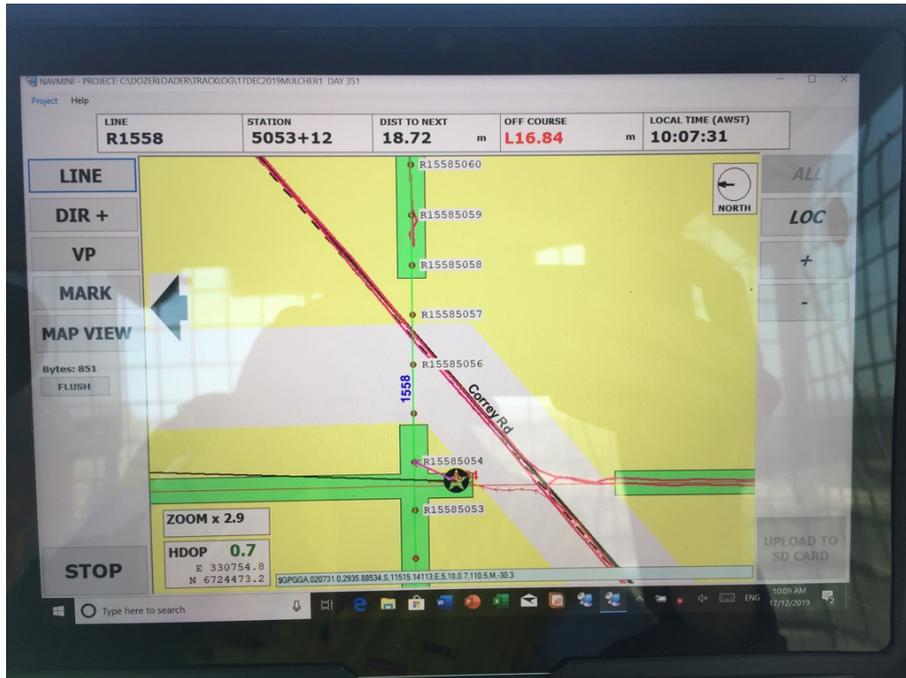


Plate 2: Source line.



Plate 3: Standard Receiver line.



Plate 4: Mulcher being blown down prior to entering private property to continue undertaking mulching of remnant native vegetation.



Plate 5: Material collected following Mulcher being blown down.



Plate 6: Mulched material left in-situ.



Plate 7: Vegetation not mulched before public roads.



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