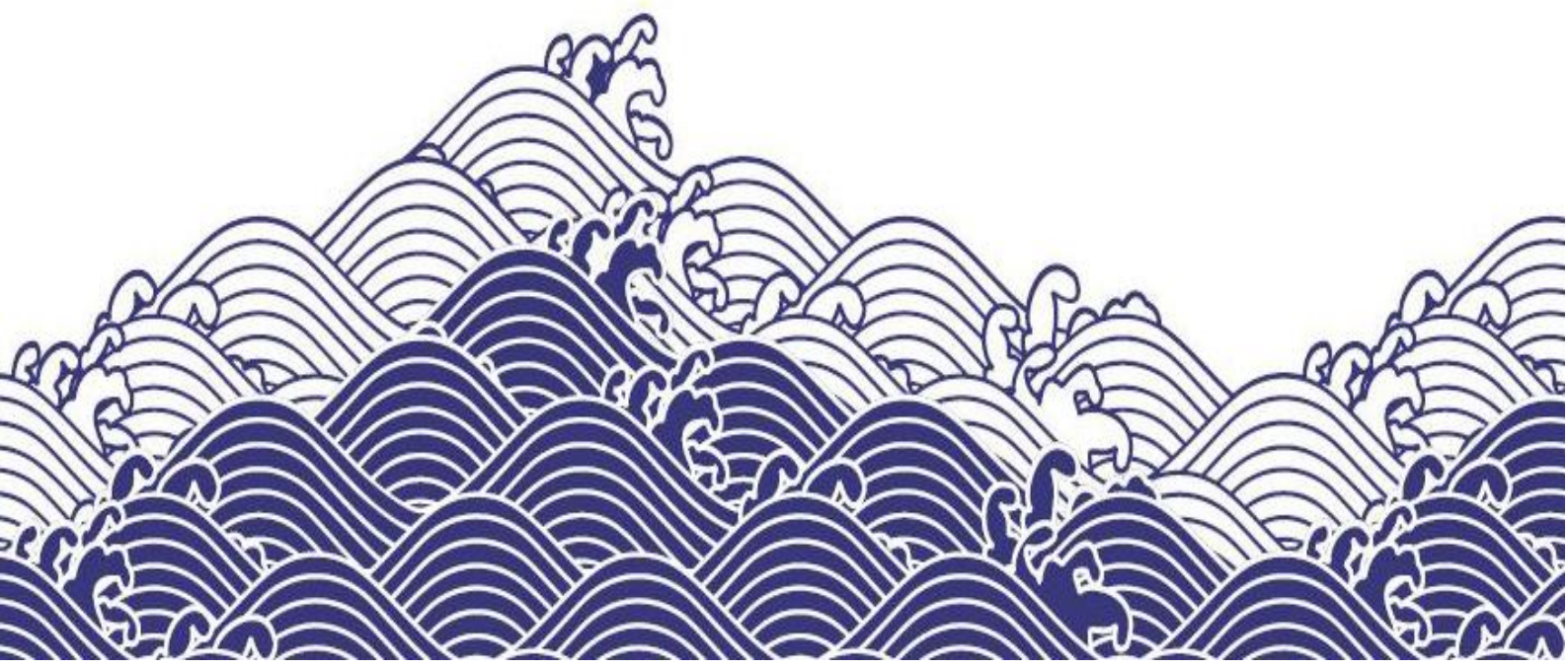




**Annual Compliance Report Ichthys  
LNG Project (EPBC  
2008/4208):2024 - 2025**



**RECORD OF AMENDMENT**

Revision	Section	Amendment
1	NA	Declaration of Accuracy

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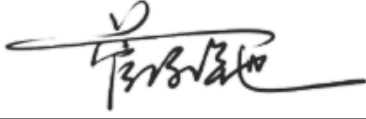
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In making this declaration, I am aware that sections 490 and 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this authorisation.

<b>Signature</b>	
<b>Full name</b>	Takuya Sugawara
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<b>Organisation</b>	INPEX Operations Australia Pty Ltd, ABN 48 150 217 262
<b>Date</b>	23 October 2025

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## ABBREVIATIONS, TERMS AND ACRONYMS

Abbreviation, term or acronym	Meaning
ALR Act	<i>Northern Territory Aboriginal Land Rights Act 1976</i>
AOC	accidentally oily contaminated
COS	Coastal Offset Strategy (X075-AH-STR-0001)
CPF	central processing facility
CCPP	combined cycle power plant
DIMT	Darwin Incident Management Team
DCCEEW	Department of Climate Change, Energy, the Environment and Water (Commonwealth)
EPBC 2008/4208	the Ichthys LNG Project Commonwealth approval
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Commonwealth)
EPL228 (as varied)	The Ichthys LNG environment protection licence issued by the NT EPA to operate the Ichthys LNG facility.
FPSO	floating production, storage and offloading (facility)
GEP	gas export pipeline
Ichthys LNG	the Ichthys LNG onshore plant
INPEX	INPEX Operations Australia Pty Ltd
IPA	Indigenous Protected Area
LDMP	Ichthys Onshore LNG Facilities: Liquid Discharge Management Plan: Operations (L060-AH-PLN-60050)
LDMP Addendum	Onshore Operations Environmental Plan and Liquid Discharge Management Plan: Addendum 1 Firefighting training (L790-AH-PLN-70000)
LNG	liquified natural gas
LPG	liquified petroleum gas
Maintenance DSDMP	Maintenance Dredging and Spoil Disposal Management Plan (L060-AH-PLN-60010)
NATA	National Association of Testing Authorities
NCW	non-contaminated water
Nearshore OPEP	Nearshore Oil Pollution Emergency Plan (X060-AH-PLN-60003)
NLC	Northern Land Council
NT	Northern Territory
NT EPA	Northern Territory Environment Protection Authority
OEMP	Onshore Operations Environmental Management Plan
OSMP	Operational and Scientific Monitoring Program
PFAS	per- and polyfluoroalkyl substance
PoM	Plan of Management

QA/QC	Quality Assurance and Quality Control
the delegated Operator	INPEX Operations Australia Pty Ltd
the Project	the Ichthys LNG Project
this Compliance Report	Annual Compliance Report Ichthys LNG Project (EPBC 2008/4208): 2023—2024 (0000-AH-REP-70160)
TN	Total nitrogen
TPH	total petroleum hydrocarbons
TRH	total recoverable hydrocarbons
TSS	total suspended solids
Wumara PoM	Wumara Conservation Area Plan of Management (0000-AH-PLN-70033)
cfu/100 mL	colony forming units per 100 millilitres
L	litres
mg/kg	milligram per kilogram
Mt	million tonnes
mV	millivolts
µg/L	micrograms per litre
µg N/L	micrograms of nitrogen per litre
µg P/L	micrograms of phosphorus per litre
µS/cm	microSeimens per centimetre
°C	degrees Celsius
%	percent

## 1 INTRODUCTION

INPEX Operations Australia Pty Ltd (INPEX) as proponent for the Ichthys LNG Project (the Project), was issued with an approval under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act; approval EPBC 2008/4208) on 27 June 2011. The EPBC 2008/4208 approval was subsequently amended by variations to conditions 1, 3, 4, 5, 7, 8, 9, 11, 13, 15, 16 and 19 made pursuant to Section 143 of the EPBC Act.

Condition 13 of EPBC 2008/4208 requires INPEX to submit a Compliance Report to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) within 15 months from commencement of operation<sup>1</sup>, with each subsequent report submitted within 12 months from the date of the previous report. This is the seventh Compliance Report to be submitted following commencement of operations on 27 July 2018.

Specific Project details are provided in Table 1-1, with an overview and status of activities described in Section 2.

**Table 1-1: Ichthys LNG Project details**

Item	Project details
EPBC number	EPBC 2008/4208
Project name	Ichthys LNG Project
Approval holder	INPEX Operations Australia Pty Ltd
Approval holder ABN	ABN 48 150 217 262
Approved Action	To develop the Ichthys Field in the Browse Basin to produce liquefied natural gas, liquefied petroleum gas and condensate and including the installation and operation of offshore extraction facilities in Ichthys Field, onshore processing facilities at Bladin Point and 850-935km pipeline from Ichthys Field to Bladin Point, Northern Territory, as described in the referral (EPBC 2008/4208) and the variation to the action dated 11 May 2011.

<sup>1</sup> The Ichthys LNG Project approval (EPBC 2008/4208) defines operations as "the commencement of gas extraction and transfer from subsea wells to the floating liquefied natural gas facility and liquefied natural gas facility and liquefied natural gas tankers". The date reflected is the date the wells were first opened offshore. Onshore operations did not commence until 14 September 2018.

## 1.1 Purpose and scope

The purpose of this Compliance Report is to meet the requirements of EPBC 2008/4208 Condition 13 (as varied 27 May 2015), which states:

*The person taking the action must submit a Compliance Report detailing compliance with any plan, report, strategy, or program (however described) referred to in relation to this approval. The date of the first Compliance Report must be submitted to the Minister within 15 months from the commencement of operation with each subsequent report submitted within 12 months from the date of the previous report. The Compliance Report must be made publicly available on the person taking the action's Australian website for the operational life of the action.*

*The Compliance Report is not required to include activities conducted within the Commonwealth Marine Area.*

*The person taking the action may cease complying with Condition 13 if they have written agreement from the Minister.*

DCCEEW representatives<sup>2</sup> have advised that the scope of the Compliance Report is limited to the demonstration of compliance with the following EPBC 2008/4208 conditions (as varied) and their associated plans, programs or strategies:

- Condition 1 - Oil Spill Contingency Plan (as varied on 03 February 2015)
- Condition 2 - Operational and Scientific Monitoring Program
- Condition 5 - Decommissioning Management Plan (as varied on 27 May 2015)
- Condition 8 - Liquid Discharge Management Plan (as varied on 03 February 2015)
- Condition 9 - Noise Management Plan (as varied on 06 March 2014)
- Condition 10 - Dredging and Spoil Disposal Management Plan (as varied on 05 April 2013)
- Condition 11 - Offsets (Coastal Offset Strategy and Plan of Management) (as varied on 10 June 2025).

This Compliance Report addresses compliance with above conditions and associated plans, programs or strategies during the 27 July 2024 to 26 July 2025 reporting period.

As per EPBC 2008/4208 Condition 13, this report does not address activities occurring in the Commonwealth Marine Area. These activities are regulated by the National Offshore Petroleum Safety and Environment Authority under the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* and associated regulations.

### 1.1.1 Variations to EPBC 2008/4208 approval conditions

Three variations to EPBC 2008/4208 approval conditions have been approved by DCCEEW during the reporting period. These variations are related to condition 11 and are outlined in Table 1-2.

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<sup>2</sup> Email correspondence received from the DCCEEW Compliance Monitoring Team on 30 July 2019.

**Table 1-2: Variations to EPBC 2008/4208 approval conditions**

Variation date	Condition (changes to condition denoted in <b>bold</b> )	Description of variation
10 June 2025	<p>Condition 11 Offsets</p> <p>The person taking the action must submit for the <b>Minister's</b> approval a <b>Coastal Offset Strategy</b> and <b>Plan of Management</b> for the protection of listed threatened species and listed migratory species impacted by the proposal in Darwin Harbour.</p> <p>a) The <b>Coastal Offset Strategy</b> must include high level details on the implementation of the following offsets outlined in the Northern Territory Government's letter to the Acting Secretary of the Department of Sustainability, Environment, Water, Population and Communities dated 23 May 2011, including a commitment and indicative schedule for the development of detailed sub-plans for each offset program:</p> <ul style="list-style-type: none"> <li>• publication of data collected for the Browse Basin and Kimberley coastline;</li> <li>• an integrated monitoring and research program for Darwin Harbour;</li> <li>• habitat mapping for Darwin Harbour Region (including Bynoe Harbour);</li> <li>• funding of Australian Research Council Linkage projects;</li> <li>• conservation management of dugongs, cetaceans and threatened marine matters of national environmental significance in the Top End; and</li> <li>• research on the conservation status, distribution and habitat use of coastal dolphins.</li> </ul> <p>b) The <b>Plan of Management</b> must include Provision for the protection and management, for the <b>life of the project</b>, of approximately 2000 ha of terrestrial vegetation and mangroves, or of an area as otherwise agreed by the <b>Minister</b>;</p> <p><i>Note 1: Protection can include the acquisition and inclusion of an area in the conservation estate, covenanting arrangements on private land, other formal agreements with private landholders, or permanent changes to management regimes on Crown or Aboriginal land.</i></p> <p><i>Note 2: This condition does not limit the provision of these offsets in synergy with any conditions of any other approving party.</i></p> <p>c) The <b>Plan of Management</b> must include Provision for the protection and management, for the <b>life of the project</b>, of marine habitat for inshore 8 Department of Climate Change, Energy, the Environment and Water OFFICIAL dolphins, marine turtles and Dugong that is preferably, but not necessarily, adjacent to the protected mangrove vegetation.</p>	<p>The condition was varied to exclude the requirement for a <i>Coastal Offset Strategy</i> under Conditions 11b and 11c and replace this with the requirement for a <i>Plan of Management</i>.</p>

Variation date	Condition (changes to condition denoted in <b>bold</b> )	Description of variation
	<p><i>Note 1: Protection can include the acquisition and inclusion of an area in the conservation estate, covenanting arrangements on private land, other formal agreements with private landholders, or changes to management regimes on Crown or Aboriginal land.</i></p> <p><i>Note 2: This condition does not limit the provision of these offsets in synergy with any conditions of any other approving party.</i></p> <p>The <b>Coastal Offset Strategy</b> and <b>Plan of Management</b> must include commitments to timeframes and funding arrangements and be made available on the proponent's website.</p> <p>The <b>Coastal Offset Strategy</b> must be submitted for approval at least three months before <b>construction</b> activities commence in Darwin Harbour. No construction activities may commence in Darwin Harbour until the <b>Coastal Offset Strategy</b> is approved.</p>	

### 1.1.2 DCCEEW approved plans or strategies

Table 1-3 provides an overview of relevant DCCEEW approved plans or strategies, which were in effect during the 27 July 2024 to 26 July 2025 reporting period.

**Table 1-3: DCCEEW approved plans or strategies**

Title	Description
<p>Ichthys Onshore LNG Facilities: Liquid Discharge Management Plan: Operations (LDMP; L060-AH-PLN-60050)</p> <p>Onshore Operations Environmental Plan and Liquid Discharge Management Plan: Addendum 1 Firefighting Training (LDMP Addendum; L790-AH-PLN-70000)</p>	<p>The LDMP describes the measures in place to mitigate the potential environmental effect of liquid discharges associated with onshore Ichthys LNG operations activities.</p> <p>The LDMP (Rev 4) was submitted in accordance with EPBC 2008/4208 Condition 8 and approved on 24 November 2022.</p> <p>The LDMP Addendum (Rev 1) was approved by DCCEEW on 23 June 2021. The LDMP Addendum was prepared, in lieu of a full revision to the LDMP, to address the requirement to undertake portable/mobile firefighting training utilising PFAS-free training foam at Ichthys LNG. The Addendum includes a description of the activity and controls and monitoring that will be undertaken. The LDMP Addendum forms part of the approved LDMP. No updates to the LDMP Addendum occurred during the reporting period.</p>
<p>Nearshore Oil Pollution Emergency Plan (Nearshore OPEP; X060-AH-PLN-60003)</p>	<p>The Nearshore OPEP describes the activities, arrangements, and framework for response to oil spills, which may occur within Northern Territory waters as a result of Ichthys LNG activities (EPBC 2008/4208, Condition 1) and the operational scientific monitoring program (EPBC 2008/4208, Condition 2), which would be implemented in the event of a spill.</p> <p>The Nearshore OPEP (Rev 1) was submitted in accordance with EPBC 2008/4208 Conditions 1 and 2 and was approved by DCCEEW on 23 February 2017. Subsequent to this, the Nearshore OPEP was updated in October 2018 (Rev 2) to incorporate administrative amendments. These amendments did not result in a new or increased risk, and as such was submitted to DCCEEW for information only in accordance with Condition 15.</p> <p>No updates to the Nearshore OPEP occurred during the 2024–2025 reporting period. A review of the Nearshore OPEP was carried out in this reporting period as outlined in Table 3-2.</p>
<p>Coastal Offset Strategy (COS; X075-AH-STR-0001)</p>	<p>The COS provides high-level details of INPEX's environmental offset programs as required by EPBC 2008/4208 Condition 11(a).</p>

Title	Description
	<p>The COS (Rev 8) was submitted in accordance with EPBC 2008/4208 Condition 15c and was approved by DCCEEW on 22 July 2021.</p> <p>No updates to the COS occurred during the 2024–2025 reporting period.</p>
<p>Wumara Conservation Area Plan of Management (Wumara PoM; 0000-AH-PLN-70033)</p>	<p>The Wumara PoM includes provisions for the protection and management of terrestrial vegetation, mangroves and marine habitats as required by EPBC 2008/4208 Condition 11(b) and 11(c).</p> <p>The Wumara PoM (Rev 5) was submitted in accordance with EPBC 2008/4208 Condition 11 and was approved by DCCEEW on 10 June 2025.</p>

## 2 DESCRIPTION OF ACTIVITIES

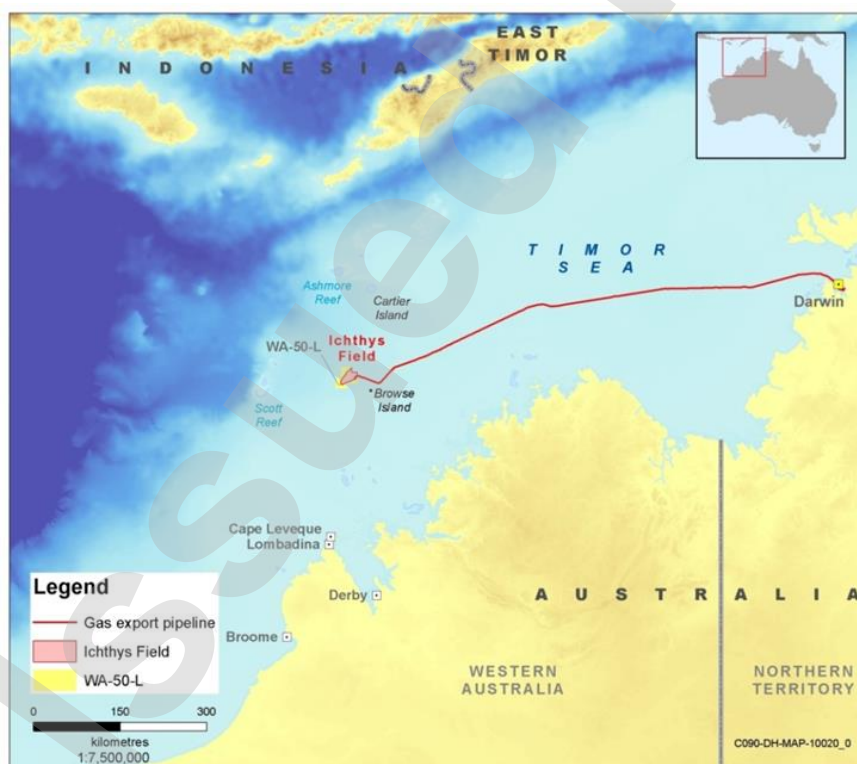
### 2.1 Ichthys project overview

The Ichthys LNG Project (the Project) is a joint venture between INPEX Operations Australia Pty Ltd (as the delegated Operator), major partner TotalEnergies, and the Australian subsidiaries of CPC Corporation Taiwan, Tokyo Gas, Osaka Gas, Kansai Electric Power, JERA and Toho Gas. Drawing on the hydrocarbon resources of the Ichthys gas and condensate field in the Browse Basin at the western edge of the Timor Sea offshore Western Australia, the Project is expected to produce 9.64 Mt of liquefied natural gas (LNG) and 1.65 Mt of liquefied petroleum gases (LPGs) per annum, along with approximately 100,000 barrels of condensate per day at peak. The Project has an expected operational life of at least 40 years.

The Ichthys Field covers an area of around 800 km<sup>2</sup> and drilling studies suggest that its hydrocarbon resources are 12.8 trillion cubic feet of sales gas and around 527 million barrels of condensate.

The extraction of natural gas and condensate is carried out via a floating semisubmersible central processing facility (CPF) at the Ichthys Field. This removes water and most of the condensate from the reservoir fluids and the separated condensate is transferred to a floating production, storage and offloading (FPSO) facility moored approximately 3.5 km from the CPF. After further processing on the FPSO, the condensate is exported directly from the field at an average rate of up to 85,000 barrels per day.

The dehydrated gas and the remainder of the condensate is compressed and exported through an approximately 890 km long gas export pipeline (GEP) to the Project's onshore processing plant at Bladin Point in Darwin Harbour in the Northern Territory (NT; see Figure 2-1).



**Figure 2-1: Project location**

## 2.2 Current status of activities

Key operations activities undertaken at Ichthys LNG onshore plant (Ichthys LNG) during the reporting period were as follows:

- Activities associated with the product (LNG, LPG and condensate) processing, storage, loading and offtake.
- Activities associated with routine and shutdown maintenance of the onshore facilities.
- Environment monitoring activities.

### 3 COMPLIANCE WITH EPBC 2008/4208 APPROVAL CONDITIONS

As per the requirements of DCCEEW (2023) the terms and definitions provided in Table 3-1 have been used to indicate the status of compliance with relevant EPBC 2008/4208 approval conditions.

A summary of the compliance status with relevant EPBC 2008/4208 approval conditions (Section 1.1), applicable timeframes and reference to evidence supporting the compliance status (as applicable) is provided in Table 3-3.

**Table 3-1: Compliance status terms, acronyms and definitions**

Term	Acronym	Definition
Compliant	C	"Compliance" is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
Non-compliant	NC	A designation of "non-compliance" should be given 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	NA	A designation of "not applicable" should be given where the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition which applies to activity that has not yet commenced.

#### 3.1 Audit, reviews and exercises

A summary of the audits, reviews and exercises, as relevant to EPBC 2008/4208 conditions, undertaken during the reporting period is provided in Table 3-2. Outcomes of audits as applicable to EPBC 2008/4208 conditions are presented in Table 3-3

**Table 3-2: Summary of audits, reviews and exercises**

Audit/review/exercise title	Scope	Date
Onshore Operations Environmental Management Plan – Annual Environmental Monitoring Report 2024-2025 third party review and endorsement  External third-party review and endorsement – ERM on behalf of Northern Territory Environment Protection Authority (NT EPA))	The review addressed compliance with the Onshore Operations Environmental Management Plan (OEMP; inclusive of liquid discharge management relevant to the LDMP), and relevant conditions of the NT EPA-issued operations environmental protection licence (EPL228 (as varied)). The review and endorsement is required as a part of the EPL228 conditions	October 2025, for the period July 1 2024 - June 30 2025

Audit/review/exercise title	Scope	Date
Nearshore OPEP Review	<p>The review will deliver a revised Nearshore OPEP that aligns with current NT emergency management arrangements and is presented in the Browse Regional OPEP format.</p> <p>The revised Nearshore OPEP will focus on three scenarios, each with a confirmed Controlling Authority and a detailed Initial Response Requirement (First Strike) table.</p> <p>It is expected that the revised Nearshore OPEP will be submitted to DCCEEW for approval in 2025/26.</p>	Ongoing.
Nearshore OPEP Oil Spill Equipment Review	<p>The review of INPEX's oil spill equipment stockpile in Darwin was conducted as part of the Nearshore OPEP review.</p> <p>The review included consultations with Darwin Port as part of a broader joint initiative to enhance oil spill response capability within the Port.</p> <p>An outcome of the review was the relocation of the INPEX Darwin Oil Spill Response Stockpile from Bhagwan to Darwin Port on 19 June 2025.</p> <p>The relocation allows the deployment of the equipment by trained Darwin Port personnel for any spill within Darwin Harbour.</p>	February to June 2025.
Darwin IMT Exercise – Exercise Foraman	<p>The INPEX Darwin Incident Management Team (DIMT) conducted Exercise Foraman on 31 October 2024 pursuant to the exercise requirement detailed in Section 2.8.2 of the INPEX ILNG Nearshore Oil Pollution Emergency Plan (NSOPEP)</p>	31 October 2024

Audit/review/exercise title	Scope	Date
	<p>Exercise Foraman was a real time desktop exercise involving the DIMIT with the ILNG Emergency Response Team (ERT) and INPEX Crisis Management Team (CMT) role played by Exercise Control.</p> <p>The aim of the exercise was to demonstrate the readiness of the INPEX DIMIT to effectively respond to a worst credible spill scenario detailed in the NSOPEP.</p> <p>The exercise identified several opportunities for continuous improvement.</p>	
First strike response operational deployment training.	<p>Selected employees of Bhagwan received oil spill response training from Response Resource Management (RRM) on 10 October 2024.</p> <p>The training focused on employment of the INPEX Booming Kit Trailer and Responder 9 to perform first strike booming operations in Darwin Harbour</p>	10 October 2024

**Table 3-3: EPBC 2008/4208 approval conditions compliance table**

Condition No.	Condition	Timing	Status	Evidence/Comments
1.	<p>Oil Spill Contingency Plan</p> <p>The person taking the action must develop and submit to the Minister for approval, an Oil Spill Contingency Plan that demonstrates the response preparedness of the person taking the action for any hydrocarbon spills, including the capacity to respond to a spill and mitigate the environmental impacts on the Commonwealth marine area and listed species habitat within offshore areas and Darwin Harbour. The Plan must include, but is not limited to:</p> <ol style="list-style-type: none"> <li>Oil spill trajectory modelling for potential spills from the action. This should include consideration of a well blow out or uncontrolled release. The modelling should be specific to the characteristics of the hydrocarbons contained in the Ichthys gas field, the likely volumes released in a worst case scenario spill, and the potential time over which the oil may be released in a worst case scenario spill, including a scenario of a minimum eleven (11) week uncontained spill;</li> <li>A description of resources available for use in containing and minimising impacts in the event of a spill and arrangements for accessing them;</li> <li>A demonstrated capacity to respond to a spill at the site, including application of dispersants, if required and appropriate, and measures that can feasibly be applied within the first 12 hours of a spill occurring;</li> <li>Identification of sensitive areas that may be impacted by a potential spill, in particular, Browse Island, specific response measures for those areas and prioritisation of those areas during a response;</li> <li>Details of the insurance arrangements that have been made in respect of paying the costs associated with operational and scientific monitoring, as outlined in the Operational and Scientific Monitoring Program required under condition 2 and repairing any environmental damage arising from potential oil spills, as determined necessary from the results of the Operational and Scientific Monitoring Program;</li> <li>Training of staff in spill response measures and identifying roles and responsibilities of personnel during a spill response; and</li> <li>Procedures for reporting oil spill incidents to the Department.</li> </ol> <p>The person taking the action must not commence drilling activities until the Oil Spill Contingency Plan is approved. The approved Oil Spill Contingency Plan must be implemented.</p>	Ongoing	Compliant	<p>During the reporting period there was no oil spill event which triggered the activation of the Plan.</p> <p>INPEX maintain two Incident Management Teams (IMT). One is located in Perth and the other is located in Darwin.</p> <p>The Darwin IMT is primarily responsible to manage emergencies related spills in Northern Territory waters.</p> <p>The Darwin IMT continue to maintain their capability via the following activities;</p> <ul style="list-style-type: none"> <li>Weekly IMT Handover meetings that include: <ul style="list-style-type: none"> <li>Current status of both onshore and offshore operations</li> <li>Any changes to Incident Management processes. This includes any changes or updates to the way we respond to Oil Spills</li> </ul> </li> <li>IMT training – This occurred on 29-31 October 2024</li> <li>IMT refresher training – All IMT members complete this annually. Training is run on a monthly basis</li> <li>Oil Spill Response Training for designated IMT members – As an outcome of the NSOPEP review a new course has been created to train IMT members on oil spill response pursuant to the NSOPEP. The ILNG Oil Spill Response Awareness Course will be delivered to all Darwin IMT members by the end of 2025.</li> </ul> <p>Insurance arrangements were maintained in accordance with the Insurance Plan described in the Nearshore OPEP during the reporting period.</p> <p>Note, the Nearshore OPEP is still undergoing a comprehensive revision due to the following influences:</p> <ul style="list-style-type: none"> <li>Changes to Northern Territory oil spill response regulatory arrangements</li> <li>Findings from periodic risk and capability review</li> <li>Findings from the level 2 exercise conducted in September 2021</li> <li>Re-structuring to align with other internal oil spill emergency plan arrangements</li> <li>The Nearshore OPEP is currently under revision. The plan will be re-issued to DCCEEW for approval once this is finalised.</li> </ul>
2.	<p>Operational and Scientific Monitoring Program</p> <p>The person taking the action must develop and submit to the Minister for approval, an Operational and Scientific Monitoring Program that will be implemented in the event of an oil spill to determine the potential extent and ecosystem consequences of such a spill, including, but not limited to:</p> <ol style="list-style-type: none"> <li>Triggers for the initiation and termination of the Operational and Scientific Monitoring Program, including, but not limited to, spill volume, composition, extent, duration, and detection of impacts.</li> <li>A description of the studies that will be undertaken to determine the operational response, potential extent of impacts, ecosystem consequences and potential environmental reparations required as a result of the oil spill;</li> <li>Details of the insurance arrangements that have been made in respect of paying the costs associated with operational and scientific monitoring, as outlined in the Operational and Scientific Monitoring Program, and repairing any environmental damage arising from potential oil spills, as determined necessary from the results of the Operational and Scientific Monitoring Program;</li> </ol>	Ongoing	Compliant	<p>The Operational and Scientific Monitoring Program (OSMP) is incorporated into the Nearshore OPEP, which address the requirements of EPBC 2008/4208 Conditions 1 and 2 (refer above).</p> <p>During the reporting period there were no spill events which required activation of the OSMP. INPEX continues to maintain a contract with an external contractor to ensure OSMP readiness, in the event this is required to be implemented.</p>

Condition No.	Condition	Timing	Status	Evidence/Comments
	<p>d. Inclusion of sufficient baseline information on the biota and the environment that may be impacted by a potential hydrocarbon spill, to enable an assessment of the impacts of such a spill;</p> <p>e. A strategy to implement the Operational and Scientific Monitoring Program, including timelines for delivery of results and mechanisms for the timely peer review of studies.</p> <p>f. In the event of an oil spill the person taking the action must pay all costs associated with all operational and scientific monitoring undertaken in response to the spill, as outlined in the approved Operational and Scientific Monitoring Program and any environmental remediation determined necessary by the results of the approved Operational and Scientific Monitoring Program; and</p> <p>g. Provision for periodic review of the program.</p> <p>The Operational and Scientific Monitoring Program must be submitted at least three months prior to the commencement of drilling activities.</p> <p>The person taking the action must not commence drilling activities until the Operational and Scientific Monitoring Program is approved. The approved Operational and Scientific Monitoring Program must be implemented.</p>			
5.	<p>Decommissioning Management Plan</p> <p>The person taking the action must submit for the Minister's approval a Decommissioning Management Plan to mitigate the environmental effects of decommissioning the proposal within the Commonwealth marine area. The Decommissioning Management Plan must include a detailed risk assessment to justify leaving any infrastructure on the seafloor of the Commonwealth marine area and must be consistent with any published Commonwealth Government policy or legislation prevailing at the time. Decommissioning cannot commence until the plan is approved. The approved plan must be implemented.</p>	Prior to decommissioning activities	Not applicable	This condition was not applicable during the reporting period.
8.	<p>Liquid Discharge Management Plan</p> <p>The person taking the action must submit for the Minister's approval a Liquid Discharge Management Plan or plans to mitigate the environmental effects of any liquid discharge from the proposal, including sewerage and surface water runoff. The Liquid Discharge Management Plan(s) must be for the protection of the Commonwealth marine area and habitat for listed species in Darwin Harbour and must:</p> <ol style="list-style-type: none"> <li>identify all sources of liquid discharge;</li> <li>describe any impacts associated with the discharge of liquids, including the cumulative impacts associated with the discharge of sewerage;</li> <li>clearly articulate the objectives of the plan and set measurable targets to demonstrate achievement of these;</li> <li>outline measures to avoid impacts;</li> <li>where impacts are unavoidable describe why they are unavoidable and measures to minimise impacts;</li> <li>demonstrate how any discharges into Darwin Harbour are consistent with the guidelines for discharges, and the water quality objectives for Darwin Harbour, developed under the National Water Quality Management Strategy;</li> <li>identify all regulatory requirements relating to the discharge of liquids and how these will be met.</li> <li>include a monitoring regime to determine achievement of objectives and success of measures used;</li> <li>outline reporting and auditing arrangements; and</li> <li>describe how the plan will apply the principles of adaptive management.</li> </ol>	Ongoing	Compliant	<p>During the reporting period, the following compliance monitoring activities were undertaken:</p> <ul style="list-style-type: none"> <li>Monthly commingled treated effluent (in-pipe) monitoring</li> <li>Biannual groundwater quality monitoring</li> </ul> <p>Non-conformance were recorded where specified commingled treated effluent (in-pipe) discharge limits had been exceeded. Note, in all cases discharge limit exceedances were investigated and corrective actions implemented at the time of the event, in accordance with the LDMP. All exceedances were minor in nature and did not result in any environmental harm or impact. Appendix A provides a summary of these exceedances.</p> <p>Results of monitoring programs demonstrate that liquid discharges associated with Ichthys LNG activities have not adversely affected the declared beneficial uses or objectives for Darwin Harbour. A description of the monitoring programs and locations is described in Section 7 of the LDMP, with a summary of the outcomes of each of these monitoring programs provided in Appendix A.</p> <p>The frequency of the monitoring programs during the reporting period are in accordance with Revision 4 of the LDMP.</p>

Condition No.	Condition	Timing	Status	Evidence/Comments
	The plan(s) must be submitted prior to the commencement of the relevant activity to which they apply. The relevant activity may not commence until the plan is approved. Separate Liquid Discharge Management plans can be submitted for the management of liquid discharges in the Commonwealth Marine Area and Darwin Harbour. The approved plan(s) must be implemented.			
9.	<p>Noise Management Plan</p> <p>The person taking the action must submit for the Minister's approval a Noise Management Plan (or multiple plans) to avoid and mitigate the noise impacts on marine fauna associated with construction activities in Darwin Harbour or the Commonwealth marine area. The Noise Management Plan/s must be for the protection of listed species in Darwin Harbour or the Commonwealth marine area (whichever area the construction activities are to be undertaken) and must:</p> <ol style="list-style-type: none"> <li>identify all sources of noise that may adversely impact fauna in Darwin Harbour or the Commonwealth marine area;</li> <li>describe any impacts associated with noise generated by pile driving and blasting;</li> <li>provide a schedule of expected pile driving and blasting activities;</li> <li>clearly articulate the objectives of the plan and set measurable targets to demonstrate achievement of these;</li> <li>outline measures to avoid impacts;</li> <li>where impacts are unavoidable describe why they are unavoidable and measures to minimise impacts;</li> <li>include a monitoring regime to determine achievement of objectives and success of measures used;</li> <li>provide for the involvement of an expert panel in the development of the plan and monitoring program required to detect and manage impacts;</li> <li>outline reporting and auditing arrangements; and</li> <li>describe how the plan will apply the principles of adaptive management.</li> </ol> <p>In addition, the person taking the action is not permitted to undertake any blasting unless it can be demonstrated that all prudent and feasible alternatives have been ruled out and the Minister has given specific permission to allow blasting. If permission is granted the person taking the action must not undertake blasting activities for more than 28 days in total, without written approval from the Minister, and must not undertake blasting before sunrise or after sunset on any of these days.</p> <p>The plan/s must be submitted at least three months prior to the commencement of any pile driving or blasting activities to which the plan applies. Pile driving or blasting activities may not commence until the plan is approved. The approved plan must be implemented.</p>	Construction phase	Not applicable	No construction activities requiring a noise management plan occurred during the reporting period.
10.	<p>Dredging and Spoil Disposal Management Plan</p> <p>The person taking the action must submit for the Minister's approval a Dredging and Spoil Disposal Management Plan (DSDMP) for the protection of inshore dolphins, marine turtles and Dugong occupying Darwin Harbour. The DSDMP must include, but is not limited to, the following:</p> <ol style="list-style-type: none"> <li>final methodologies for dredging including the method and timing of dredging activities;</li> <li>a schedule for dredging activities;</li> <li>a comparison of dredging methodologies proposed based on potential impacts on dolphins, turtles and Dugongs associated with individual methods, including noise and sediment plumes;</li> <li>justification of the dredging option/s chosen based on best practice at the time;</li> </ol>	Ongoing	Not applicable	<p>The Maintenance Dredging and Spoil Disposal Management Plan (Maintenance DSDMP; L060-AH-PLN-60010), which covered dredging activities during a five-year period (January 2018 – January 2023) ceased to be in effect as of 31 January 2023.</p> <p>INPEX is currently in the process of preparing a new Maintenance DSDMP, which it will submit for Ministerial approval in Q4 2025/Q1 2026.</p>

Condition No.	Condition	Timing	Status	Evidence/Comments
	<p>e. mitigation measures, including measures for each type of dredge to avoid entrapment of marine turtles;</p> <p>f. methods to prevent, detect and respond to impacts on any number of marine turtles;</p> <p>g. measures that allow the alteration of dredging activities and/or implement mitigation methods in an adaptive management framework to ensure the protection of turtles, Dugongs and dolphins;</p> <p>h. the outcomes of hydrodynamic and sediment transport modelling required to predict impacts and finalise the design of the dredging campaign;</p> <p>i. contingencies to manage dredging if there is a significant departure from predicted impacts;</p> <p>j. an ecological monitoring program, which must exist either in full within the DSDMP, or as a standalone document (see Note 1 below) that is appropriately referenced in the DSDMP;</p> <p>k. the involvement of an expert panel in the development of the plan and monitoring program required to detect and manage impacts; and</p> <p>l. reporting and auditing arrangements.</p> <p>The DSDMP must be submitted at least three months prior to the commencement of dredging. Dredging for which the DSDMP has been prepared must not commence until the DSDMP is approved. The approved DSDMP must be implemented.</p> <p>Note 1: Regarding condition 10(j); if the person taking the action wishes to prepare the ecological monitoring program as a standalone document, then the ecological monitoring program must be approved in writing by the Minister. The approved ecological program must be implemented.</p>			
11.	<p><b>Offsets</b></p> <p>The person taking the action must submit for the Minister's approval a Coastal Offset Strategy and Plan of Management for the protection of listed threatened species and listed migratory species impacted by the proposal in Darwin Harbour. The Coastal Offset Strategy must include:</p> <p>a. The Coastal Offset Strategy must include high level details on the implementation of the following offsets outlined in the Northern Territory Government's letter to the Acting Secretary of the Department of Sustainability, Environment, Water, Population and Communities dated 23 May 2011, including a commitment and indicative schedule for the development of detailed sub-plans for each offset program:</p> <ul style="list-style-type: none"> <li>• publication of data collected for the Browse Basin and Kimberley coastline;</li> <li>• an integrated monitoring and research program for Darwin Harbour;</li> <li>• habitat mapping for Darwin Harbour Region (including Bynoe Harbour);</li> <li>• funding of Australian Research Council Linkage projects;</li> <li>• conservation management of dugongs, cetaceans and threatened marine matters of national environmental significance in the Top End; and</li> <li>• research on the conservation status, distribution and habitat use of coastal dolphins.</li> </ul> <p>b. The Plan of Management must include provision for the protection and management, for the life of the project, of approximately 2000 ha of terrestrial vegetation and mangroves, or of an area as otherwise agreed by the Minister;</p> <p><i>Note 1: Protection can include the acquisition and inclusion of an area in the conservation estate, covenanting arrangements on private land, other formal agreements with private landholders, or permanent changes to management regimes on Crown or Aboriginal land.</i></p> <p><i>Note 2: This condition does not limit the provision of these offsets in synergy with any conditions of any other approving party.</i></p>	Ongoing	Compliant	<p><b>Condition 11a</b></p> <p>Condition 11a offset programs which have been completed and were reported on in previous Compliance Reports have been excluded from this Compliance Report. The following Condition 11a programs remain ongoing during the 2024/2025 reporting period:</p> <ul style="list-style-type: none"> <li>• Darwin Harbour integrated marine monitoring and research program</li> <li>• Conservation management of dugongs, cetaceans and threatened marine matters of national environmental significance in the Top End.</li> </ul> <p><u>Darwin Harbour integrated marine monitoring and research program</u></p> <p>During the reporting period a number of field activities and reports were completed, including:</p> <ul style="list-style-type: none"> <li>• Sediment Monitoring: <ul style="list-style-type: none"> <li>• Completion of the annual Darwin Harbour benthic sediment monitoring report for 2024/25</li> <li>• Completion of Revision 2 of the Benthic Sediment Monitoring Plan for Darwin Harbour.</li> </ul> </li> <li>• Anthropogenic Pressures: <ul style="list-style-type: none"> <li>• Completion of the Darwin Harbour pressure monitoring report for 2024/25</li> <li>• Completion of Revision 2 of the Anthropogenic Pressure Monitoring Plan for Darwin Harbour</li> <li>• Completion of the rod surface elevation report for 2024.</li> </ul> </li> <li>• Mangrove Monitoring: <ul style="list-style-type: none"> <li>• Completion the Darwin Harbour mangrove monitoring report for 2023/24.</li> <li>• Completion the Darwin Harbour mangrove extent mapping review from 2016 to 2023</li> </ul> </li> </ul>

Condition No.	Condition	Timing	Status	Evidence/Comments
	<p>c. The Plan of Management must include provision for the protection and management, for the life of the project, of marine habitat for inshore dolphins, marine turtles and Dugong that is preferably, but not necessarily, adjacent to the protected mangrove vegetation.</p> <p><i>Note 1: Protection can include the acquisition and inclusion of an area in the conservation estate, covenanting arrangements on private land, other formal agreements with private landholders, or changes to management regimes on Crown or Aboriginal land.</i></p> <p><i>Note 2: This condition does not limit the provision of these offsets in synergy with any conditions of any other approving party.</i></p> <p>The Coastal Offset Strategy and Plan of Management must include commitments to timeframes and funding arrangements and be made available on the proponent's website. The Coastal Offset Strategy must be submitted for approval at least three months before construction activities commence in Darwin Harbour. No construction activities may commence in Darwin Harbour until the Coastal Offset Strategy is approved.</p>			<ul style="list-style-type: none"> <li>Darwin Harbour Integrated Monitoring and Research Coordination Committee meetings were held 17 October 2024 and 14 April 2025.</li> </ul> <p><u>Conservation management of dugongs, cetaceans and threatened marine matters of national environmental significance in the Top End</u></p> <p>The fourth year of funding was provided during the reporting period, with applications through the Northern Territory Governments Aboriginal Ranger Grants Program. Following review of applications, the Northern Territory Government awarded six new grants in the reporting period, with ongoing funding also provided to seven existing multi-year projects awarded in the previous year/s. Total grant funding for the reporting period was \$1,812,098.84.</p> <p>The six new grants are summarised below:</p> <p>New Conservation Projects:</p> <ul style="list-style-type: none"> <li><i>Yirralka Rangers Hawksbill Turtle Nesting Project</i> - this project will focus on nesting density and movement of hawksbill turtles off Garrthalala via beach surveys and satellite tags. This work will support the Yirralka Rangers, Yolju owners, and caretakers to develop effective plans to contribute to miyapinu conservation and build local capacity within the IPA.</li> <li><i>Increasing Tiwi Ranger capacity to manage Tiwi Sea country biodiversity and habitats</i> - Tiwi Rangers will undertake mapping of seagrass beds, assessing their health, and surveying species that depend on them, including turtles, dugongs, fish, whales, and dolphins.</li> <li><i>Larrakia Biodiversity Project</i> - project contributes to better managing and understanding the behaviours, movements, numbers and locations of threatened birds (great knot, lesser sand plover and greater sand plover), turtles (flatback, green, hawksbill and olive ridley) and dolphins through continuation of annual dolphin survey, monthly shorebird surveys, weekly turtle nesting surveys (increased to daily during peak nesting) and annual helicopter megafauna survey.</li> </ul> <p>Capital:</p> <ul style="list-style-type: none"> <li><i>Anindilyakwa Ranger Vessel (Makarda II)</i> - This vessel will be used to deliver sea country activities outlined in the Anindilyakwa Indigenous Protected Area (IPA), that covers 10,000 km<sup>2</sup> (70% sea country with over 1,000 km of coastline). This includes marine debris removal, feral animal control, coral resilience monitoring program, and protected marine species monitoring</li> <li><i>Tiwi Ranger Vessel</i> - funding for a small vessel that will allow rangers to shallow intertidal areas, river mouths and creeks currently inaccessible by their larger vessels to undertake seagrass monitoring, NT fishery patrols, cultural mapping, and other sea country management activities</li> <li><i>Crocodile Island Ranger tele-handler</i> - procurement of tele-handler required to load, travel to and unload monitoring equipment and supplies on beached and islands throughout the Crocodile Islands IPA including for several turtle monitoring programs and marine debris surveillance.</li> </ul> <p><b>Condition 11b and 11c</b></p> <p>The Wumara PoM (Rev 5) was submitted in accordance with EPBC 2008/4208 Condition 11 and was approved by DCCEEW on 10 June 2025. This PoM and associated variation to approval conditions removed the requirement for Condition 11(b) and 11(c) to be included in the COS, and instead relied upon the PoM to administer the project. The variation and PoM also removed the requirement for a Conservation Agreement under S305 of the EPBC Act.</p>

Condition No.	Condition	Timing	Status	Evidence/Comments
				<p>A funding agreement was subsequently drafted between INPEX and the Bawanninga Homelands Aboriginal Corporation to administer funding of activities completed under the PoM. Negotiations with the Northern Land Council on the terms of a section 19 land use covenant are ongoing.</p> <p>Off country compliance activities commenced on the 1 July 2025. These include planning for on country work, briefings, and the writing of various documents. On country activities are due to commence once the land use covenant is approved by the Arnhem Land Trust and INPEX.</p> <p>Project information related to this offset condition is available at <a href="https://www.inpex.com.au/projects/ichthys-lng/our-commitments/">https://www.inpex.com.au/projects/ichthys-lng/our-commitments/</a>.</p>

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## **APPENDIX A: SUMMARY OF OPERATIONS MONITORING PROGRAM RESULTS**

### **A.1 Commingled treated effluent (in-pipe) monitoring**

Commingled treated effluent (in-pipe) sampling was undertaken monthly throughout the reporting period. Where an exceedance was detected, additional sampling was undertaken where this was determined to be required. In addition to routine monthly sampling, ad hoc sampling was undertaken as part of the onsite laboratory National Association of Testing Authorities (NATA) Australia accreditation Quality Assurance and Quality Control (QA/QC) processes.

The results for in-pipe monitoring at sample location 750-SC-003 for the reporting period are presented in Table A-1. Results that exceeded discharge limits are shown in bold text.

Overall, there was generally little variability of the wastewater quality, with the majority of results below discharge limits described in the LDMP. The total number of discharge exceedances experienced in the 2024/2025 reporting period (five) exceedances in thermotolerant coliforms (three), and total nitrogen (two). These are detailed further in Table A-.

#### **A.1.1 Limit exceedance assessment outcomes**

A summary table of all discharge limit exceedances, including corrective actions is provided in Table A-.

Post the April 2025 total nitrogen exceedance event, further investigation was conducted on contributing wastewater streams upstream of the jetty outfall location sample point. This confirming that the main sources of nitrogen are historically from with the Combined Cycle Power Plant (CCPP). This was able to inform the June 2025 total nitrogen exceedance investigation to focus on the CCPP area as the source of origin for the total nitrogen. The investigation was able to confirm that elevated sources of ammonia originating from the CCPP was the source of the total nitrogen exceedance. INPEX engineering confirmed that the faulty conductivity analyser used to analyse pH in the CCPP ammonia dosing skid, incorrectly calculated pH to be lower. Consequently, the ammonia pumps automatically increased stroke to 100% to rectify/increase the incorrectly calculated pH, causing the system to overdose ammonia. The overdose in ammonia resulted in an increased concentration of Total Nitrogen, causing the exceedance at Jetty Outfall L750-SC-003 (Treated Effluent). A maintenance work order was raised to fix the pH analyser, and ammonia dosing was managed manually in the meantime. The out of calibration analyser was recalibrated and put back into automatic function 12<sup>th</sup> June 2025.

A thermotolerant coliform exceedance at L-750-SC-003 (Treated Effluent) occurred immediately prior to this annual compliance report timeline commencing (see previous 2023-2024 compliance report) The July 2024 thermotolerant coliform exceedance event contributed to both the August 2025 and September 2025 exceedance events. An investigation report was prepared regarding the thermotolerant coliform exceedance events from July to September, indicating that the source of the coliforms was not faecal. Sample results from sample location L-750-SC-009 (Treated Water) confirmed that the origin of the coliforms did not originate from the Wastewater Treatment Plant (WWTP) onsite. Routine monthly sampling on 8 October 2024 confirmed that the thermotolerant coliform levels at the jetty outfall sample location L-750-SC-003 (Treated Effluent) was back within the license parameters.

The June 2025 investigation report identified multiple sources of thermotolerant coliforms that are part of the Accidentally Oil Contaminated (AOC) wastewater treatment onsite. The follow up sampling was able to determine that the source of thermotolerant coliforms was not faecal in nature via obtaining sample results from L-750-SC-004 (Irrigation Water) & L-750-SC-009 (Treated Water). Hypochlorite dosing was administered to treat the affected AOC sumps. Confirmation that the thermotolerant coliforms levels were back within license limits was obtained via routine monthly sampling conducted on 8 July 2025.

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**Table A-1: Monthly sampling results for 750-SC-003 (shaded bold values indicate an exceedance)**

Date	TIME	LIMS Sample ID	pH	Electrical conductivity	Temperature	Turbidity	Dissolved oxygen	TPH as oil & grease	TRH (C6-C10)	TRH (C10-C40)	TSS	BOD	COD	Free Chlorine	Ammonia	Total nitrogen	Total phosphorus	Filterable Reactive Phosphorus	Cadmium	Chromium	Copper	Lead	Mercury	Nickel	Silver	Zinc	Enterococci	E coli	Thermotolerant/Faecal coliforms	Anionic surfactants	aMDEA	Glycol (MEG)	Glycol (TEG)	
Unit			pH units	µS/cm	°C	NTU	%	mg/L	µg/L	µg/L	mg/L	mg/L	mg/L	mg/L	µg N/L	mg N/L	mg P/L	mg P/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	cfu/100 mL	cfu/100 mL	cfu/100mL	mg/L	mg/L	mg/L	mg/L	
Discharge limit			6-9	n/a	35	n/a	n/a	6	n/a	n/a	10	20	125	2	n/a	10	2	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	100	400	n/a	n/a	n/a	n/a	n/a
13/08/2024	08:15	L2403885001	8.3	219	26.7	1.5	80	< 1	<20	<100	< 5	3	12	0.02	6	9	1.3	1.1	<0.1	<1	1	<1	<0.1	<1	<1	117	47	100	<b>870</b>	<0.1	< 5	< 5	< 5	
10/09/2024	08:04	L2404369001	8.0	217	29.0	1.5	78	< 1	<20	<100	< 5	5	14	0.02	6	6	1.0	1.0	<0.1	<1	<1	<1	<0.1	<1	<1	23	46	35	<b>750</b>	<0.1	< 5	< 5	< 5	
08/10/2024	07:40	L2404898001	7.8	376	30.5	1.0	77	< 1	<20	<100	< 5	10	15	0.04	5	5	< 0.5	< 0.5	<0.1	<1	2	<1	<0.1	1	<1	197	12	1	150	0.2	< 5	< 5	< 5	
12/11/2024	08:30	L2405502001	8.0	400	32.2	1.5	96	< 1	<20	<100	< 5	6	17	0.03	3	4	< 0.5	< 0.5	<0.1	<1	<1	<1	<0.1	2	<1	216	78	<1	330	<0.1	<5	<5	<5	
10/12/2024	07:48	L2405995001	7.8	369	30.9	1.5	76	< 1	<20	<100	< 5	5	13	0.03	5	6	< 0.5	< 0.5	<0.1	<1	2	<1	<0.1	1	<1	140	67	<1	300	<0.1	<5	<5	<5	
14/01/2025	07:35	L2500193001	7.8	298	31.0	1.5	89	< 1	<20	<100	< 5	2	18	0.03	2	2	1.0	< 0.5	<0.1	<1	2	<1	<0.1	1	<1	357	<1	<1	250	<0.1	<5	<5	<5	
11/02/2025	08:20	L2500691001	8.1	314	29.8	1.5	86	< 1	<20	<100	< 5	3	11	0.02	6	6	< 0.5	< 0.5	<0.1	<1	2	<1	<0.1	1	<1	373	24	<1	110	<0.1	<5	<5	<5	
11/03/2025	07:55	L2501135001	8.0	292	31.7	1.0	74	< 1	<20	<100	< 5	5	13	0.02	3	3	< 0.5	< 0.5	<0.1	<1	3	<1	<0.1	<1	<1	113	1	<1	28	<0.1	<5	<5	<5	
08/04/2025	07:55	L2501630001	8.7	573	29.1	<0.5	78	< 1	<20	<100	< 5	<2	11	0.04	19	<b>19</b>	< 0.5	< 0.5	<0.1	<1	3	<1	<0.1	<1	<1	18	<1	<1	18	<0.1	<5	<5	<5	
13/05/2025	09:25	L2502422001	8.1	335	29.8	0.5	88	< 1	<20	<100	< 5	10	11	0.02	9	9	< 0.5	< 0.5	<0.1	<1	9	1	<0.1	5	<1	176	<1	<1	110	<0.1	<5	<5	<5	
10/06/2025	09:32	L2502889001	9.0	405	26.6	0.5	85	< 1	<20	<100	< 5	2	12	0.02	18	<b>15</b>	< 0.5	< 0.5	<0.1	<1	6	<1	<0.1	2	<1	147	2	3	<b>660</b>	<0.1	<5	<5	<5	

**Table A-2: Summary of commingled treated effluent sample point exceedance events**

Date sampled	Exceedance reported	Parameter	Result	Limit	Contributing factors	Corrective actions
13 August 2024	23 August 2024	Thermotolerant coliforms	870 CFU/100ml	400 CFU/100ml	During the investigation of a previous thermotolerant coliform exceedance that occurred in the previous reporting period (10 July 2024), another two thermotolerant coliform exceedances were detected (in August and September) from the combined Jetty Outfall discharge location 750-SC-003 during routine monthly sampling, and were included within this investigation report.	The following actions were taken to improve performance of the WWTP:
10 September 2024	13 September 2024	Thermotolerant coliforms	750 CFU/100ml	400 CFU/100ml	<p>Sampling results from the investigation indicated that E. Coli and Enterococci results were significantly lower than the Thermotolerant Coliform results, and therefore it was unlikely that the Thermotolerant Coliform exceedances were solely from a faecal source.</p> <p>Following the exceedance in July 2024, INPEX conducted a site investigation of the WWTP between 23-24 July 2024 and confirmed that the C/D/E/F membrane bioreactors (MBR) were still performing well. However, MBR membranes A and B at L-750-SU-004 were in poor condition (high turbidity permeate). The low performance of MBR membranes A/B at L-750-SU-004 appeared to be masked because membranes C/D/E/F were producing excellent quality permeate and the WWTP was running within specification and below design capacity<sup>3</sup>. Therefore, it was recommended that MBR membranes A/B at L-750-SU-004 be replaced to maintain excellent quality permeate.</p>	<ul style="list-style-type: none"> <li>Replacement of two electronic ballast, UV lamps in the WWTP occurred since the last exceedance in September 2024</li> <li>Replacement of four yellow induction LEDs for electronic ballast functionality replaced on control panel in the WWTP</li> <li>Verification that all UV lamps in the WWTP were in working order, and</li> <li>Confirmation that the irradiance value on UV meter LCD within the WWTP is 90%</li> <li>Draining of the irrigation tank, on two occasions, to remove sludge by vacuum truck (and dispose offsite), to reduce residual sludge that may contribute to the out of specification (OOS) results, and</li> <li>Utilisation of the irrigation tank to circulate stagnant water from SU-404 observation basin), to reduce residual sludge that may contribute to the out of specification (OOS) results.</li> </ul> <p>The below MOCs were focused on ensuring wastewater originating from the WWTP onsite were within specifications to assure the source of the thermotolerant coliform exceedances were not faecal in nature:</p> <ul style="list-style-type: none"> <li>Implementation of MOC #200016721 to replace WWTP Inlet screen by Q1 2025, and</li> <li>Implementation of MOC #200016981 to replace two of the six MBR membrane cassettes (A and B) which had performance issues in July 2024 between June to December 2025.</li> </ul>
8 April 2025	9 April 2025	Total nitrogen	20mg/L	10mg/L	<p>CCPP contributing to the TN exceedance and the observation basin pumps (404-A/B) were offline when the sample was taken.</p> <p>During the routine monthly sampling event on 08 April 2025, the following wastewater streams were flowing into the combined jetty discharge outfall line (L750-SC-003):</p> <ul style="list-style-type: none"> <li>CCPP Neutralisation Package</li> <li>Demin Package</li> <li>Treated Water from Irrigation tank.</li> </ul> <p>As part of the investigation process, a total of 8 additional samples were carried out the following sample locations assisting formulated the subsequent corrective actions:</p> <ul style="list-style-type: none"> <li>Observation Basin (L-750-SU-404)</li> <li>Open Ground Flare COC Pit1 (L-750-SU-051)</li> <li>Filtered Water Package (L-750-SC-002)</li> <li>Jetty Outfall comingled (L-750-SC-003).</li> </ul>	<p>Through the incident investigation process, the following actions were identified to understand the issue, prevent reoccurrence and better manage future exceedances:</p> <ol style="list-style-type: none"> <li>Environment to check the basis of design for sampling procedure of the Jetty Outfall, to see whether it requires streams and pumps to be flowing, or whether it restricts the pumps to be turned off prior to sampling</li> <li>Subject to action 1; Onshore Laboratory to review current sampling procedure.</li> </ol>

Date sampled	Exceedance reported	Parameter	Result	Limit	Contributing factors	Corrective actions
10 June 2025	11 June 2025	Total nitrogen	15mg/L	10mg/L	<p>The investigation confirmed that the TN exceedance was caused by elevated ammonia levels in the combined cycle power production (CCPP) package. The cause for the elevated ammonia in the CCPP was associated with a faulty conductivity analyser which is designed to calculate pH of the CCPP blowdown wastewater.</p> <p>INPEX engineering confirmed that the faulty conductivity analyser used to analyse pH in the CCPP ammonia dosing skid<sup>1</sup>, incorrectly calculated pH to be lower. Consequently, the ammonia pumps automatically increased stroke to 100% to rectify/increase the incorrectly calculated pH, causing the system to overdose ammonia. The overdose in ammonia resulted in an increased concentration of TN, causing the exceedance at Jetty Outfall L750-SC-003</p> <p>The root cause of the event was attributed to faulty equipment within the CCPP ammonia dosing skid.</p>	<ul style="list-style-type: none"> <li>• Raise a notification and work order to frontline engineering and maintenance to rectify the pH analyser issue. The 'out of calibration' analyser was recalibrated and put back into automatic function 12<sup>th</sup> June 2025</li> <li>• Instruct CCPP package operators to switch ammonia dosing from AUTO to MANUAL control to manage pH levels.</li> </ul>
10 June 2025	19 June 2025	Thermotolerant coliforms	660mg/L	400mg/L	<p>Based on the investigation results, the exact cause or source of the thermotolerant coliform exceedance is unknown because elevated results of thermotolerant coliforms were observed in the following systems:</p> <ul style="list-style-type: none"> <li>• The Jetty Outfall (750-SC-003) had the highest level of thermotolerant coliform on 19 June at 2000 CFU/100mL; however, this reduced to 260 CFU/100mL on 8 July 2025</li> <li>• The observation basin (750-SU-404) had an elevated level of thermotolerant coliforms on 19 June 2025 at 800 CFU/100mL; however, this reduced to 620 CFU/100mL on 2 July 2025</li> <li>• The filtered water ex 750-T-550 (750-SC-002) with 380 CFU/100mL on 2 July 2025, and</li> <li>• The AOC holding basin inlet (750-SU-403) with 250 CFU/100mL on 2 July 2025.</li> </ul> <p>The other systems investigated, had low levels of thermotolerant coliforms detected, and were therefore not considered further in the investigation. Furthermore, sample results taken on 19 June 2025 at 750-SC-004 (Irrigation Water ex 750-T-550) and 750-SC-009 (Irrigation Tank) confirmed that cause of the event was not faecal in nature with low e.coli levels.</p>	<ul style="list-style-type: none"> <li>• Chemical dosing advice was issued on 5 July 2025, to treat the following sumps 750-SU-402; 750-SU-404 and 750-SU-406 with sodium hypochlorite and sump 750-SU-403 with calcium hypochlorite, to reduce thermotolerant coliform levels</li> <li>• Investigation of UV unit identified that it was operating below specification</li> <li>• Maintenance Notification was raised rectify the UV unit on 23 June 2025</li> <li>• Routine monthly sampling at Jetty Outfall (L-750-SC-003) on 8 July 2025 (LIMS Sample ID L2503364001) confirmed that the thermotolerant coliform levels were back within specification</li> <li>• No further actions will be undertaken, other than routine monthly sampling at Jetty Outfall location L-750-SC-003 (next sample due early August 2025).</li> </ul> <p>Should another exceedance occur, additional hypochlorite dosing may be considered to the Irrigation Tank and Observation Basin.</p>

## A.2 Groundwater monitoring

Investigations were completed for all trigger exceedances. Investigations considered multiple lines of evidence, such as rainfall, seasonal factors, Ichthys LNG operational activities and any spill events, to determine if increasing trends in groundwater analytes were likely to be as a result of Ichthys LNG.

Investigations completed following the October 2024 and April 2025 monitoring events concluded that the reported trigger exceedances were not as a result of Ichthys LNG operations and were likely natural (e.g. represent seasonal trends and natural variability). Therefore, no further evaluation or management response was required.

As per the LDMP, two groundwater surveys were completed during the reporting period, in October 2024 (Survey 14) and April 2025 (Survey 15). A high-level summary of groundwater results is provided in the following sections, with data collected during the reporting period provided in Table A-. To date, groundwater monitoring during the operations phase of Ichthys LNG shows that there has been no change in groundwater quality.

### Survey 14

Forty-one exceedances against benchmark levels and three technical exceedances were recorded in groundwater monitoring survey 14 in October 2024. Exceedances include 21 for nutrients, 19 for dissolved metals and one for pH. No exceedances were recorded for hydrocarbons, mercury or physicochemical parameters.

All exceedances have been compared to data recorded during the dry season months of May to October between May 2016 and October 2024.

- Visual assessment of time plotted data indicates that several of the nutrient analyte exceedances represent short-term spikes, potentially related to seasonal environmental variables, rather than increasing trends. Visual assessment of time plotted data has indicated the following trends for nutrient exceedances: Ammonia: Increasing trends at VWP341, BPGW40, BPGW41 and BPGW26
- Total nitrogen: Increasing trends, albeit fluctuating at BPGW40
- Filterable reactive phosphorus (FRP): Increasing trend at BPGW40.

Visual assessment of time plotted data for metal exceedances has indicated the following trends:

- Cobalt: Increasing trend at VWP341 and BPGW41
- Copper: Increasing trend at BPGW41
- Zinc: Increasing trend at VWP341.

The following historical maximum values were recorded during the October 2024 monitoring survey:

- Ammonia at BPGW26 (374 µg/L)
- FRP at BPGW40 (32 µg/L)
- Cobalt at BPGW41 (1.7 µg/L)
- Copper at BPGW41 (3.0 µg/L).

Results of the investigation into each of the exceedances are described below.

## Survey 15

Thirty-eight exceedances against both the trigger and background concentrations were recorded in the fifteenth groundwater monitoring survey in April 2025. Exceedances include 14 for nutrients, 21 for dissolved metals and 3 for pH. No exceedances were recorded for hydrocarbons, mercury or physicochemical parameters.

Repeated exceedances were plotted on time series graph to compare to pre-construction and construction data and discern trends in the data.

A review of the 14 nutrient exceedances from April 2025 monitoring survey found that eight of the exceedances were consecutive for at least three surveys. Trend analysis completed by the monitoring contractor indicates:

- Ammonia:
  - Increasing trends for ammonia at BPGW40
  - Increasing trends for ammonia has stabilised at BPGW41 and VWP341
  - Fluctuating trends for ammonia at BPGW18, BPGW20, and BPGW28
- Nitrogen: Fluctuating long-term trend for total nitrogen at BPGW40, BPGW41 and VWP341
- Oxides of nitrogen: Consistent fluctuating trend of oxides of nitrogen, with concentrations increasing in the wet season and decreasing in the dry season at BPGW38A.
- FRP: Slightly increasing trend at BPGW07 has stabilised.

A review of the 15 metal exceedances from April 2025 monitoring survey found that nine of the exceedances were consecutive for at least three surveys. Trend analysis of the metals exceedances completed by the monitoring contractor indicates that:

- Arsenic: Increasing albeit fluctuating long-term trend at BPGW09 and VWP328.
- Cobalt: Stable but fluctuating at BPGW08A; and increasing trend at BPGW09, VWP328, BPGW40 and VWP341.
- Zinc: Increasing trend at VWP341.
- Copper: Fluctuating trend at BPGW07.
- Manganese: Fluctuating and increasing trend at VWP341 and BPGW09.
- Nickel: Stable overall but fluctuating at VWP341.
- Zinc: Fluctuations at BPGW07, fluctuating and increasing VWP341.

The following historical maximum values were recorded during the April 2025 monitoring survey:

- Aluminium at BPGW20 (774 µg/L)
- Aluminium at BPGW28 (336 µg/L)
- Ammonia at BPGW41(807 µg/L)
- Cobalt at BPGW40 (2.3 µg/L) and at VWP341 (185 µg/L)
- Manganese at BPGW07 (1560 µg/L), BPGW09 (763 µg/L) and VWP341 (3520 µg/L)
- Zinc at VWP341(176 µg/L)

**Trigger assessment outcomes**

In accordance with the receiving environment adaptive management process outlined in Section 7.4 of the LDMP, groundwater trigger exceedances were investigated. A summary of the number of trigger exceedances by survey is provided in Table A-.

**Table A-3: Summary of groundwater trigger exceedances**

Survey	Date	Physio-chemical	Nutrients	Metals
Survey 14	October 2024	1	21	19
Survey 15	April 2025	3	14	21

**Table A-4: 2024-2025 LDMP Monitoring Period Groundwater Monitoring Results**

Monitoring Round	LocCode	Sampled Date-Time	Ammonia as N	Nitrogen (Total)	Oxides of Nitrogen	Phosphate total (P)	Reactive Phosphorus as P	TSS	TDS	Aluminium (Filtered)	Arsenic (Filtered)	Cadmium (Filtered)	Chromium (hexavalent) (Filtered)	Chromium (Trivalent)	Cobalt (Filtered)	Copper (Filtered)	Lead (Filtered)	Manganese (Filtered)	Mercury (Filtered)	Nickel (Filtered)	Silver (Filtered)	Vanadium (Filtered)	Zinc (Filtered)	Benzene	Ethylbenzene	Toluene	Xylene Total	TRH C6-C40	Biological oxygen demand (BOD)	E. coli	Dissolved Oxygen (%)	EC (field)	pH (Field)	Redox	Temp	
Units	n/a	n/a	ug/l																								MPN / 100mL	% sat	uS/cm	pH_Units	mV	°C				
Groundwater Survey 14	BPGW01	1/10/2024	29	230	91	40	18	-	2310	486	2.5	4.7	<1	<1	48	4.4	13.4	1200	<0.04	36.1	0.4	<0.2	228	<1	<2	<2	<2	<2	<100	-	-	19.9	4,097	4.51	173.2	30.0
	BPGW07	1/10/2024	18	640	18	23	21	-	71,000	5	6.6	0.2	<1	<10	23	<1	1.4	976	<0.04	25	<0.1	<0.5	51	<1	<2	<2	<2	<2	<100	-	-	23.2	86,440	5.83	82.5	31.2
	BPGW08A	1/10/2024	99	240	<20	26	27	-	10,600	92	9.8	0.6	<1	<1	58.2	<0.5	1.4	5090	<0.04	33.2	<0.1	0.4	53	<1	<2	<2	<2	<2	<100	-	-	16.3	17,222	4.76	162.3	31.5
	BPGW09	1/10/2024	56	550	<20	6	3	-	91,300	<5	50.8	<0.2	<10	<10	3.1	<1	0.2	327	<0.04	1.9	<0.1	<0.5	6	<1	<2	<2	<2	<2	<100	-	-	30.2	103,037	6.23	17.0	31.0
	BPGW18	3/10/2024	653	880	50	70	<10	-	55,600	<5	10.3	<0.2	<100	<100	<0.2	1	<0.2	74.2	<0.04	0.7	<0.1	0.8	<5	<1	<2	<2	<2	<2	<100	-	-	28.3	81,127	6.04	-2.8	30.2
	BPGW19A	2/10/2024	1730	2350	<2	39	16	-	51,200	40	1.2	<0.2	<1	<10	<0.2	<1	<0.2	60.7	<0.04	<0.5	<0.1	3	5	<1	<2	<2	<2	<2	<100	<1	<1	3.8	78,366	6.08	4.2	31.3
	BPGW20	3/10/2024	124	120	<20	8	7	-	644	<5	2.6	<0.05	<1	<1	2.1	<0.5	<0.1	35.9	<0.04	1.2	<0.1	<0.2	7	<1	<2	<2	<2	<2	<100	-	-	14.8	1,472	5.41	42.5	33.2
	BPGW26	2/10/2024	374	550	<20	14	7	-	8050	<5	6.8	<0.05	<1	<1	9.7	<0.5	0.1	2880	<0.04	1.6	<0.1	<0.2	9	<1	<2	<2	<2	<2	<100	-	-	4.3	20,516	5.66	85.4	31.2
	BPGW27A	2/10/2024	331	260	<20	<5	5	-	1440	<5	1.4	<0.05	<1	<1	2.2	<0.5	<0.1	28.7	<0.04	0.6	<0.1	<0.2	4	<1	<2	<2	<2	<2	<100	<1	<1	5.3	2,878	5.39	94.1	33.6
	BPGW28	3/10/2024	850	1370	26	48	21	-	82,200	<5	2.8	<0.2	<1	<10	<0.2	<1	<0.2	166	<0.04	<0.5	<0.1	0.7	<5	<1	<2	<2	<2	<2	<100	-	-	16.3	116,354	6.35	-29.5	30.9
	BPGW38A	2/10/2024	82	160	<2	16	8	-	994	<5	0.7	0.37	<1	<1	0.6	<0.5	<0.1	23.7	<0.04	1	<0.1	0.3	9	<1	<2	<2	<2	<2	<100	-	-	8.1	1,711	6.01	87.5	33.1
	BPGW40	2/10/2024	742	790	<20	35	32	-	12,200	11	5.7	<0.05	<1	<1	<0.1	<0.5	<0.1	16.2	<0.04	<0.5	<0.1	0.4	7	<1	<2	<2	<2	<2	<100	-	-	3.9	6,299	6.04	-26.4	31.4
	BPGW41	3/10/2024	546	590	<20	9	13	-	3210	<5	8	<0.05	<1	<1	1.7	3	0.2	185	<0.04	<0.5	<0.1	<0.2	7	<1	<2	<2	<2	<2	<100	-	-	39.1	21,658	6.62	-1.6	30.5
	VWP328	3/10/2024	316	500	<20	<5	7	-	75,500	<5	580	<0.2	<1	<10	20.8	<1	0.4	350	<0.04	3.2	<0.1	<0.5	10	<1	<2	<2	<2	<2	<100	-	-	49.6	108,800	5.65	13.9	30.6
VWP341	2/10/2024	695	720	<20	55	8	-	2340	8	7.3	<0.05	<1	<1	162	<0.5	0.1	2480	<0.04	16.3	<0.1	0.3	136	<1	<2	<2	<2	<2	<100	-	-	19.8	4,291	5.46	59.8	33.2	
Groundwater Survey 15	BPGW01	31/03/2025	15	110	<2	8	1	-	60	48	3	<0.05	<1	<1	1.8	<0.5	0.2	138	<0.04	0.5	<0.1	<0.2	3	<1	<2	<2	<2	<2	<100	-	-	2.6	193	5.02	-40.1	29.5
	BPGW07	15/04/2025	399	613	<2	28	20	-	92,600	8	5.8	0.5	<1	<0.1	30.6	<1	1.3	1560	<0.04	33.2	<0.1	1.1	67	<1	<2	<2	<2	<2	<100	-	-	1.2	87,198	5.59	20.2	31.0
	BPGW08A	15/04/2025	33	156	<20	35	<1	-	2,830	6	26.7	<0.05	<1	<1	46.7	<0.5	<0.1	3360	<0.04	19.4	<0.1	<0.2	7	<1	<2	<2	<2	<2	<100	-	-	2.2	4,439	5.70	-103.0	31.8
	BPGW09	15/04/2025	231	451	<20	<5	2	-	156,000	<5	73.2	<0.2	<1	<10	5.5	<1	0.9	763	<0.04	2	<0.1	0.6	<5	<1	<2	<2	<2	<2	<100	-	-	0.6	124,438	5.97	-77.9	30.6
	BPGW18	16/04/2025	675	888	<20	45	<1	-	48,900	7	11.5	<0.2	<1	<1	<0.2	<1	<0.2	80.9	<0.1	0.7	<0.1	1.7	<5	<1	<2	<2	<2	<2	<100	-	-	1.1	70,021	6.22	-99.8	30.3
	BPGW19A	16/04/2025	1660	2690	<20	33	<1	-	53,400	76	5.9	<0.2	<1	2	<0.2	<1	0.2	54.8	<0.1	<0.5	<0.1	4.9	<5	<1	<2	<2	<2	<2	<100	3.9	<1	1.0	74,609	6.16	-125.1	30.7
	BPGW20	16/04/2025	122	223	<20	14	<1	-	604	774	2.7	<0.05	<1	<1	1.5	<0.5	0.5	25.6	<0.1	1.4	<0.1	3	7	<1	<2	<2	<2	<2	<100	-	-	20.1	938	5.46	-10.0	33.4
	BPGW26	15/04/2025	167	240	<20	19	<1	-	3,670	<5	3.4	<0.05	<1	<1	6.7	<0.5	<0.1	1780	<0.04	1	<0.1	<0.2	3	<1	<2	<2	<2	<2	<100	-	-	1.0	7,026	5.61	-81.7	32.2
	BPGW27A	16/04/2025	247	254	<20	<5	<1	-	1,180	12	0.7	<0.05	<1	<1	1.7	<0.5	<0.1	23.3	<0.1	0.5	<0.1	<0.2	2	<1	<2	<2	<2	<2	<100	1.5	2	0.5	2,106	5.14	24.6	33.5
	BPGW28	16/04/2025	1010	1550		16	<1	-	77,600	336	2.8	<0.2	<1	<1	<0.2	<1	0.4	176	<0.1	<0.5	<0.1	1.9	<5	<1	<2	<2	<2	<2	<100	-	-	81.1	96,345	6.56	-115.6	30.8
	BPGW38A	15/04/2025	<50	171	0.213	<5	<1	-	144	7	<0.2	<0.05	<1	<1	<0.1	<0.5	<0.1	<0.5	<0.04	<0.5	<0.1	0.4	5	<1	<2	<2	<2	<2	<100	-	-	3.5	268	6.69	23.9	31.8
	BPGW40	15/04/2025	376	390	<0.02	5	<1	-	2,830	<5	7.8	<0.05	<1	<1	2.3	<0.5	<0.1	188	<0.04	0.8	<0.1	<0.2	4	<1	<2	<2	<2	<2	<100	-	-	1.2	5,271	6.04	-128.8	30.3
	BPGW41	29/04/2025	807	1100	0.005	15	<10	-	13,900	<5	7.4	<0.05	<1	<1	<0.1	<0.5	0.001	16.8	<0.04	<0.5	<0.1	0.5	14	<1	<2	<2	<2	<2	<100	-	-	1.6	18,214	6.73	-173.2	29.6
	VWP328	29/04/2025	251	560	<0.02	<5	<1	-	81,100	<5	5.94	<0.2	<1	<10	19.4	<1	0.4	367	<0.04	2.4	<0.1	<0.5	<5	<1	<2	<2	<2	<2	<100	-	-	4.9	84,402	5.99	-70.9	30.3
VWP341	15/04/2025	612	577	<0.02	31	2	-	1,920	16	6.1	<0.05	<1	<1	185	<0.5	0.2	3520	<0.04	16.3	<0.1	0.4	176	<1	<2	<2	<2	<2	<100	-	-	3.5	3,074	5.22	-4.5	33.5	