

Lower Fitzroy River Infrastructure

EPBC (2009/5173) Annual Compliance Report
17 July 2024 to 16 July 2025



Contents

Executive Summary.....	4
Overview	5
Background	5
Details of activities undertaken during reporting period	5
Appendix A – Correcting Non-compliances.....	33

Declaration of accuracy

In making this declaration, I am aware that sections 490 and 491 of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (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 declaration.

Signed: *Jason Smith*

17/10/2025

Full name: Jason Smith

Position: General Manager Central

Organisation: Sunwater Limited (ABN: 17 020 276 523)

Date: 17 October 2025

Executive Summary

This Annual Compliance Report (Report) is for the reporting period 17 July 2024 to 16 July 2025. The Report is required by Condition 10 of the Environment Protection and Biodiversity Conservation (EPBC) Act approval 2009/5173 to assess Sunwater's compliance against the conditions of the approval. The Report is required to be published on the Sunwater website within three months of every 12-month anniversary of the commencement of the action. This Report only considers those aspects of the approved action relevant to the construction and operation of a new weir near Rookwood crossing, and the construction and operation of associated ancillary infrastructure in Queensland. Aspects relating to the raising of the existing Eden Bann Weir are not considered due to the works not being progressed at this time.

During the reporting period, Sunwater undertook extensive works to meet the complex suite of individual environmental obligations relating to water quality monitoring, land management and irrigation practices, biodiversity offsets, and species protection measures. A summary of completed works is provided in this report.

Sunwater has achieved compliance with the majority of EPBC Approval conditions during the reporting period (Conditions 4, 7, 8, 9, 10, 12, 14, 17, 18, 19, 20).

Conditions 3, 11, 13, 15, 16 and 21 were not applicable during the reporting period.

Sunwater has identified non-compliances with four EPBC Approval conditions (Conditions 1, 2, 5 and 6), each of which involves failure to achieve requirements under particular management plans. These compliance gaps are primarily administrative or timing-related (e.g. missed sampling event or delay in achieving management plan actions). Where partial non-compliance has occurred, required actions were in progress but not fully completed within specified timeframes. Several corrective actions are already underway and planned and are detailed in this report. Based on available evidence, Sunwater is not aware of any actual or likely significant impacts on MNES arising from these non-compliances. No instances of environmental harm or damage have been observed. Although no environmental harm has been observed or reported, Sunwater recognises that the lack of evidence does not guarantee the absence of impact.

Sunwater considers it important to view the non-compliances in context. Rookwood Weir (Managibei Gamu) remains in the early stages of operation, and the relevant environmental programs, including water quality, Land Management Code of Practice (LMCOP), offsets, and turtle management, have been implemented for the first time over the past year. While some initial challenges have occurred, these programs are becoming established within Sunwater's operations team. All non-compliances arose from distinct circumstances such as procedural delays, resourcing or contracting challenges, and evolving interpretations of new code requirements, rather than disregard for obligations. Furthermore, Sunwater has undertaken additional steps to achieve compliance including additional community engagement, a deep commitment to building capacity in First Nations businesses and appointing additional resources to oversee delivery of contracts.

Description of activities

Overview

EPBC number	EPBC 2009/5173
Project name	Lower Fitzroy River Infrastructure Project, Queensland
Approval holder and ACN or ABN	Sunwater Limited ABN: 17 020 276 523
Approved action	The raising of the existing Eden Bann Weir, construction, and operation of a new weir near Rookwood crossing, and construction and operation of associated ancillary infrastructure. Note: as outlined above, only the Rookwood Weir component is being undertaken during this reporting period.
Scope of compliance report	Rookwood Weir component of the LFRIP
Location of the project	Rookwood Weir, approximately 66 km south-west of Rockhampton.
Dates for the reporting period of the report	17 July 2024 to 16 July 2025

Background

The project was granted approval on 28 February 2017, and the conditions were varied on 27 May 2020 and again on 27 July 2021. The approval conditions outlined in Table 1 reflect the varied approval conditions dated 27 July 2021. The construction of the new Rookwood Weir (Managibei Gamu) and associated ancillary infrastructure has concluded however Sunwater continues to operate the weir and associated infrastructure.

Commencement of the action was deemed to occur following commencement of construction of Riverslea Bridge, which occurred on 17 July 2020. A notice of commencement was provided to the Department of Agriculture, Water and Environment (DAWE, now the Department of Climate Change, Energy Efficiency and Water (DCCEEW)) on 22 July 2020. Construction of the Rookwood Weir to the height of RL 46.2m commenced in 2021 and was completed in December 2023. The Rookwood Weir became operational commencing water supply in August 2024 following an extended wet commissioning phase.

Details of activities undertaken during reporting period

Activities carried out for the period of 17 July 2024 to 16 July 2025 in accordance with conditions of the EPBC Act approval included operation and maintenance of the asset. The transition from construction to operation and business as usual occurred during this time and included setting the asset up for the future. This comprised construction of the office, amenities and warehouses and furnishing with the required equipment and materials for operation and maintenance of the asset.

Project compliance

Table 1 provides details of the status of compliance with the conditions of the EPBC Act approval notice (EPBC 2009/5173). The following designations have been used to record findings in this compliance report:

Compliant

‘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

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

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 an activity that has not yet commenced.

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
1	Water Quality Monitoring Program a) The approval holder must develop a separate water quality monitoring and reporting program (Program) for each weir that is to be constructed or raised, in consultation with the Great Barrier Reef Marine Park Authority and the following Queensland Government departments, that meets current recognised standards for water quality monitoring and reporting: i. Department of Environment and Science (DES); ii. REVOKED iii. Department of Agriculture and Fisheries; and iv. Department of Natural Resources, Mines and Energy; b) The Program for each weir must specify the monitoring activities and procedures capable of predicting potential, and detecting actual, impacts from the action in respect of the relevant weir on the Great Barrier Reef World Heritage Area and National Heritage place that may result from: i. changes in nutrient concentrations and oxygen levels due to decaying vegetation; and ii. agricultural development facilitated by the action in respect of the relevant weir. c) In order to predict, detect and manage impacts on the Great Barrier Reef World Heritage Area and National Heritage place, the Program for each weir must: i. specify water quality characteristics for: ii. the lower Fitzroy River; iii. water entering irrigation areas from higher in the sub-catchment; and iv. water flowing from irrigated areas, and comparable unirrigated areas; v. provide details of water sampling and analysis methodologies for detecting and predicting all water impacts on matters of national environmental significance (MNES) from changes in water quality that may be derived from the action in respect of the relevant weir;	Non-compliant	Sunwater has achieved compliance with the following items under Condition 1: The revised Water Quality Monitoring and Reporting Program (WQMRP) was submitted to DCCEEW and, following a period of review and revision, was approved on 30 May 2024. In accordance with Condition 18 of the EPBC Act approval, the WQMRP was published on the Rookwood Weir Project web page on 3 June 2024 and is available publicly at Sunwater website – Rookwood Weir Scheme. A Suitably Qualified Person (SQP) was engaged to complete monthly and event-based water quality monitoring during the reporting period, 17 July 2024 to 16 July 2025. An Annual Water Quality Monitoring Report (AWQMR) was prepared for the reporting period (i.e. 17 July 2024 to 16 July 2025) in accordance with the WQMRP. The AWQMR has concluded, upon assessment of the water quality monitoring data, that overall: • There was no evidence that operation of the Rookwood Weir has influenced water

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
	vi. provide details of reporting requirements, including timeframes, vii. state the reliability of the Program to predict and detect changes to water quality as a result of implementing the action in respect of the relevant weir, and include adaptive implementation and continuous viii. improvement systems to enhance its capacity to predict and detect changes to water quality and impacts on the Great Barrier Reef World Heritage Area and National Heritage place; ix. outline how monitoring will be conducted during major flood events for the purpose of the Program; x. provide details of a process for: xi. reviewing the effectiveness of the Program; and xii. amending and/or terminating the Program; xiii. provide sufficient information, including the establishment of pre-action baselines, to enable the determination of, and the need for, the water quality offset appropriate to fully offset any residual water quality impacts on the Great Barrier Reef World Heritage Area and National Heritage place for each year in which those impacts occur. d) If the monitoring results from the Program for a weir determine that a residual impact to the Great Barrier Reef World Heritage Area and National Heritage place is likely to or has actually occurred, the approval holder must notify the Minister within 20 business days. If and when such notification occurs, a description of actions and timeframes for the provision of water quality offsets in accordance with the Program and the offsets strategy for that weir must be provided to the Minister within 20 business days after notification. e) Prior to inundation of the impoundment from the construction or raising of a weir, the approval holder must submit the Program for that weir for approval by the Minister in writing. No water from the raising of Eden Bann Weir or Rookwood Weir respectively may be used for the purpose of irrigated agriculture until the Program for that weir has been approved by the Minister and the water quality baselines required under condition 1.c) vii. for that weir		quality of the Lower Fitzroy River. • There is no evidence indicating that operation of Rookwood Weir has influenced water quality risks for the Great Barrier Reef. The AWQMR was submitted to DCCEEW on 17 October 2025, and is publicly available at Sunwater website – Rookwood Weir Scheme. Non-compliances with two elements of condition 1 relating to the implementation of the management plan were identified, and reported to DCCEEW under Condition 19 on 17 September 2025. Non-compliances are outlined below. Refer to Appendix A for a summary of corrective measures taken or planned to be completed. Section 11 of the WQMRP requires a monthly review of data including against the rolling median. Failure to conduct monthly exceedance assessment of water quality data from August 2024 to July 2025, as required under the WQMRP. Field data was collected monthly by the water quality contractor and provided to Sunwater,

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
	have been established. f) The Program for each weir must be designed to complement relevant existing or future water quality monitoring programs including, but not limited to, the Reef 2050 Integrated Monitoring and Reporting Program.		however no investigations of exceedances were undertaken in the non-compliance period. Section 8.2.1 of the WQRMP requires first sampling will commence within 48 hours of the start of the event (defined by the trigger flows at each of the three stations). On 02/01/2025 12:01pm, flow was triggered by Knebworth gauge (Dawson River) and the 48-hour window to take first sample was not achieved. Sampling was instead conducted 05/01/2025 between 07:22-15:00.
2	Land Management Code of Practice a) The approval holder must develop a separate land management code of practice (code) for each weir that is to be constructed or raised, in consultation with the Great Barrier Reef Marine Park Authority and the following Queensland Government departments and stakeholders: i. Department of Agriculture and Fisheries; ii. Department of Environment and Science; iii. Department of Natural Resources Mines and Energy; and iv. community and relevant agricultural industry bodies. b) Prior to inundation of the impoundment from the construction or raising of a weir, the approval holder must submit the code for that weir for approval by the Minister in writing. No water from the raising of Eden Bann Weir or Rookwood Weir respectively may be used for the purpose of irrigated agriculture until the code for that weir has been approved by the Minister. The approved code(s) must be implemented. c) The code for each weir must: i. include water quality objectives for nutrients, sediments, and farm chemicals for the sub-catchment. Those objectives must include	Non-compliant	Sunwater has achieved compliance with some elements under Condition 2. A summary is provided below: During the reporting period, twenty-four (24) customer Farm Plans and/or Best Practice Transition Plans were submitted or re-submitted for assessment of compliance with the Land Management Code of Practice (LMCOP). Of these twenty-four plans, none could be deemed fully compliant with the LMCOP by the independent agronomist engaged by Sunwater to undertake this assessment. This was due to several factors: • Delayed approval of the LMCOP

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
	sediment, water column concentration and flow weighted total pollutant loading objectives and targets; ii. demonstrate how the water quality objectives will meet the targets of the Reef 2050 Plan and the Reef Water Quality Protection Plan as updated from time to time; iii. include land and water management practices that will be implemented by the purchaser of the water to ensure water quality objectives are achieved, accounting for seasonal variability, and the types of agriculture and water uses undertaken; iv. include a process for: A. reviewing the effectiveness of the code with respect to achieving and maintaining water quality objectives; and B. amending the code if water quality objectives are not met; d) The code for each weir may include an accreditation scheme for individual irrigators that may reduce any monitoring and compliance obligations. e) The approval holder must require each purchaser, proposing to use water in a manner that may impact on the quality of the water entering the Great Barrier Reef World Heritage Area and National Heritage place, to comply with the approved code for the relevant weir; and f) The approval holder must require the purchaser to provide annual notification of compliance with the approved code for the relevant weir, as it applies to land management practices on their property or require the purchaser to participate in the accreditation scheme under condition 2d).		• Incorporation of 'Innovative Practice' rather than 'Best Practice' matters as described in the Reef 2050 Water Quality Risk Frameworks, created significant challenges for irrigators who had invested heavily in what was understood to be 'Best Practice' farming infrastructure • Numerous irrigators raised concerns that the requirements of best practice as nominated in the Code were impractical for their crop types, did not include irrigator's crop types or were unachievable with respect to significant changes that would need to be made to farming infrastructure. A revised LMCOP was approved by DCCEEW under EPBC Approval Condition 12 in July 2025. The revisions acknowledged that alternative farm practices to those prescribed in the LMCOP could be permitted in limited circumstances where deemed to meet the objectives of the LMCOP by the Sunwater-appointed agronomist, provided the objectives of the LMCOP could be met.

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
			An Annual Workshop was held in August 2025, a requirement of Section 9 of LMCOP, to review the role of LMCOP and the effectiveness of practices included within it in terms of recognising current best practice and practicality and achievability for the water user. The Workshop was attended by Sunwater, Department of Primary Industries QLD (DPI), Fitzroy Basin Association (Natural Resource Management body), Advance Rockhampton (Economic Development Unit of Rockhampton Regional Council), and independent agronomists engaged by Sunwater. During the workshop, challenges experienced during implementation of the LMCOP to date were discussed and proposed amendments agreed to for subsequent submission to DCCEEW. Non-compliances with some elements of condition 2 relating to the implementation of the management plan were identified, and reported to DCCEEW under Condition 19 on 17 September 2025. Non-compliances are outlined below. Refer to Appendix A for a summary of corrective measures taken or planned to be completed.

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
			Section 3 of LMCOP requires that each irrigator must develop a Farm Plan or Best Practice Transition Plans (BPTP) compliant with the LMCOP prior to the use of the water allocation on the property. There were no approved, fully compliant Farm Plans or BPTP at the time of first water purchase on two properties. A draft Farm Plan for Rookwood/Riverton was deemed to be 'Partially compliant', by the Suitably Qualified Person (SQP) in July 2024. It is understood the irrigator commenced taking water on 10 October 2024 predominantly for the purpose of commissioning farming infrastructure, while a BPTP was under development. A draft Farm Plan for Yarra was deemed the Farm Plan to be 'Partially compliant' by the SQP in July 2024. It is understood that the irrigator commenced taking water on 1 August 2024 predominantly for the purpose of commissioning farming infrastructure, while a BPTP was under development. No actual or potential impacts resulted from delayed approval of Farm Plans. Sunwater has not identified any impacts to water quality of the Fitzroy River or

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
			Great Barrier Reef associated with the operation of Rookwood Weir (Managibei Gamu), as detailed in AWQMR.
3	Pre-clearance surveys a) Prior to clearing/inundation of vegetation for each weir that is to be constructed or raised, the approval holder must undertake a pre-clearance survey and prepare a preclearance survey report for the impact area of the relevant weir to identify the extent of EPBC Act listed threatened species and ecological communities. b) The pre-clearance survey for each weir must: i. be undertaken in accordance with the Department's survey guidelines in effect at the time of the survey, or another survey methodology agreed by the Department prior to the survey being undertaken; ii. be undertaken by a suitably qualified person/s. iii. Revoked iv. Revoked v. Revoked c) The pre-clearance survey report for each weir must: i. Include details of survey methods utilised and the timing of the survey ii. identify measures to minimise mortality of EPBC Act listed threatened species and impacts on listed threatened ecological communities; iii. identify measures to protect EPBC Act listed threatened species and ecological community habitat located adjacent to the cleared/inundated areas; iv. for any EPBC Act listed threatened species and ecological communities identified during the survey, provide to the Department precise data on the areas of habitat or ecological community directly and indirectly	Not applicable	Not undertaken during the period.

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments															
	impacted by the action and a description of proposed management measures to be implemented. d) The approval holder must provide the pre-clearance survey report for each weir to be constructed or raised to the Department within 25 business days after the completion of the survey for the respective weir.																	
4	Offset strategy a) The approval holder must submit for the Minister's written approval, a separate Offset Strategy for each weir to be constructed or raised, which identifies the residual impacts arising from the respective weir on the following MNES: i. Brigalow (<i>Acacia harpophylla</i> dominant and codominant) ecological community; ii. Black Ironbox (<i>Eucalyptus raveretiana</i>); iii. Red Goshawk (<i>Erythroriorchis radiates</i>); iv. Fitzroy River Turtle (<i>Rheodytes leukops</i>); v. Great Barrier Reef World Heritage Area and National Heritage place. b) The offset strategy for each weir must propose in general terms the offsets that the approval holder will provide for the residual impacts arising from the construction or raising of the relevant weir, as set out in <u>Table 1</u>, and how the approval holder intends to deliver the offset obligations. Table 1 <table><tr><th>Impact</th><th colspan="2">Indicative impact area/quantity</th></tr><tr><td></td><th>Rookwood Weir</th><th>Eden Bann Weir (not constructed)</th></tr><tr><td colspan="3">Listed threatened species and ecological communities</td></tr><tr><td>i. Inundation of Fitzroy River Turtle nest sites within the weir impoundment areas</td><td></td><td></td></tr><tr><td>ii. Modifying aquatic habitat for the Fitzroy River Turtle</td><td>660 ha</td><td>282 ha</td></tr></table>	Impact	Indicative impact area/quantity			Rookwood Weir	Eden Bann Weir (not constructed)	Listed threatened species and ecological communities			i. Inundation of Fitzroy River Turtle nest sites within the weir impoundment areas			ii. Modifying aquatic habitat for the Fitzroy River Turtle	660 ha	282 ha	Compliant	The Biodiversity Offsets Strategy (BOS) for the original project design was approved by DAWE (now DCCEEW) on 27 April 2021. The Offsets Strategy included field verified vegetation and impact areas at the Riverslea Bridge and Rookwood Weir construction areas. The Offsets Strategy was approved with the requirement that following the inundation area pre-clearance surveys, the Strategy be revised to include the verified impacts requiring offsetting and be submitted for approval by the Minister. In addition, since the Strategy was approved, the overall height of the weir was increased from RL 45.5 to RL 46.2. As outlined against Condition 3, pre-clearance surveys of the inundation area were undertaken in September 2021. These surveys included the additional areas required for inundation to RL 46.2. As such, the Strategy was revised based on the increased weir height to RL 46.2 and pre-clearance surveys. The revised Strategy was submitted to DCCEEW in
Impact	Indicative impact area/quantity																	
	Rookwood Weir	Eden Bann Weir (not constructed)																
Listed threatened species and ecological communities																		
i. Inundation of Fitzroy River Turtle nest sites within the weir impoundment areas																		
ii. Modifying aquatic habitat for the Fitzroy River Turtle	660 ha	282 ha																

Condition Number/Reference	Condition	Compliance Status		Evidence/Comments
	iii. Loss of Red Goshawk nesting habitat	588 ha	384 ha	January 2022 and approved on 17 November 2022. In accordance with Condition 18 of the EPBC Act approval, the Offset Strategy was published on the Rookwood Weir Project web page and is available publicly at: Sunwater website – Rookwood Weir Scheme
	iv. Loss of the area of Black Ironbox habitat	Impact area to be determined by pre-clearance surveys required under condition 3		
	v. Loss of the area of Brigalow (<i>Acacia harpophylla</i> dominant and co-dominant) ecological community	Impact area to be determined by pre-clearance surveys required under condition 3		
	vi. Any increase in nutrients, sediments, farm chemicals and/or other water quality parameters above baseline levels	As determined by the Program approved in accordance with condition 1		
	vii. Any increase in nitrogen due to decaying vegetation in the inundation area	At least 194 tonnes ^{1, 2}	At least 458 tonnes ²	
		Unless the monitoring required at condition 1b) i. conclusively determines that the impact is less than predicted ¹		
Notes: (1) The indicative areas/quantities will need to be determined based on the particular weir to (first) be constructed or raised. (2) Unless a different impact area is determined by the pre-clearance survey required under condition 3.				
c) The offset strategy for each weir must include, but is not limited to:				
i. offset outcomes to be achieved, for listed threatened species and ecological communities listed in Table 1 ;				
ii. details of how offsets will be provided for modifying Fitzroy River Turtle aquatic habitat (Table 1, item ii.);				

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
	iii. the timeline and legal mechanism/s for securing the offset area/s and offset outcomes; iv. information about how the offset area/s will provide connectivity with other relevant habitats and biodiversity corridors; v. details of how water quality offsets will be provided consistent with Table 1; vi. inputs and justification for inputs demonstrating that the offsets are likely to be in accordance with the EPBC Act Environmental Offsets Policy and relevant Reef 2050 Plan requirements, including the net benefit principle. d) The approval holder must not commence construction or raising of the relevant weir unless the offset strategy for that weir has been approved by the Minister in writing. The approved offset strategy relevant to each weir must be implemented.		
5	Offset Management Plans a) The approval holder must submit for the Minister's written approval a separate offset management plan for each weir to be constructed or raised, addressing each offset requirement in condition 4 for any weir for which an offset strategy has been approved by the Minister. b) The offset management plan for each weir must be consistent with the approved offset strategy for the relevant weir. c) The offset management plan for each weir must include, but not be limited to: i. the offset area/s to be secured for the listed threatened species and ecological communities listed in Table 1; ii. a description and map to clearly define the location and boundaries of the offset area/s, accompanied by the offset attributes; iii. information about how the offset area/s provide connectivity with other relevant habitats and biodiversity corridors; iv. a description of the management measures (including timing, frequency, and duration) that will be implemented in each offset area;	Non-compliant	Sunwater has achieved compliance with the following items under Condition 5: Offset Management Plans (OMP) have been developed and submitted to DCCEE in accordance with Condition 5 for the following Matters of National Environmental Significance: • Inundation of Fitzroy River Turtle nest sites • Modification of Fitzroy River Turtle aquatic habitat • Loss of Red Goshawk nesting habitat • Loss of Black Ironbox habitat • Loss of Brigalow habitat

Condition Number/ Reference	Condition	Compliance Status	Evidence/Comments
	v. details of how the management measures proposed are consistent with relevant approved conservation advice, recovery plans and threat abatement plans; vi. performance and completion criteria for implementing the offset management plan/s for evaluating its effectiveness, and criteria for triggering corrective action/s; vii. a program for monitoring and reporting on the effectiveness of the management measures, and progress against the performance and completion criteria; viii. a description of potential risks to the successful implementation of the offset/s, and contingency measures that can be implemented to mitigate against these risks; and ix. evidence that the offsets are in accordance with the EPBC Act Environmental Offsets Policy and relevant Reef 2050 Plan requirements including the net benefit principle. d) In respect of offsets for impacts to the Fitzroy River turtle, the offset management plan for each weir must: i. be in accordance with Appendix G of the additional information to the EIS (AEIS) and the Addendum to the AEIS ii. ensure the effectiveness of the offset in achieving long-term protection and management of Fitzroy River Turtle nesting habitat until the outcomes of the offset management plan are achieved; iii. specify the offset delivery mechanism. If the mechanism is through a financial settlement, then the financial contribution must be calculated using the Financial Settlement Offset Calculator and offset payments in relation to each weir must be made in full within one year of the completion of each stage of construction or raising of that weir. e) The approval holder must not begin inundation of the impoundment of a weir unless the Minister has approved in writing an offset management plan for the relevant weir for all offset requirements in the		• Great Barrier Reef World Heritage Area and National Heritage place. In accordance with Condition 18 of the EPBC Act approval, OMPs approved by DCCEEW are published on the Sunwater website and are available publicly at: Sunwater website – Rookwood Weir Scheme <i>Water Quality (Nitrogen) Offset Management Plan (Great Barrier Reef World Heritage Area)</i> OMP was approved on 30 May 2024 with a revised nitrogen offset quantity of 194 tonnes to be delivered over a period of 10 years, with 80 per cent to be delivered within six years, unless the monitoring program demonstrates there was no impact. The water quality monitoring for 12 months of inundation indicates there has been no increase in nitrogen released from the impoundment. External expert review found there is no demonstrable impact to nitrogen at 12 months post inundation. This is conclusively less than the predicted (roughly modelled) 645 tonnes of Nitrogen. An Interim Nitrogen Assessment Report (NAR) was prepared for period December

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
	approved offset strategy for that weir. The approved offset management plan for each weir must be implemented. f) For the offsets for modifying Fitzroy River turtle aquatic habitat (condition 4. b) ii. [within Table 1]), the approval holder may elect to provide a financial offset in a manner approved by the Minister, as calculated using the Financial Settlement Offset Calculator, or as otherwise agreed by the Minister.		2023 to November 2024 and submitted to DCCEEW on 20 June 2025. The NAR has concluded, upon assessment of the monitoring data, that: • The concentrations and loads of nitrogen in the lower Fitzroy River have not increased during the 12 months of inundation of Rookwood Weir compared to baseline condition. • There are no apparent increased water quality risks for the Great Barrier Reef, and it is unlikely that a nitrogen offset would be required based on the first 12 months of inundation. A technical streambank assessment report was also provided to DCCEEW in June 2025. Furthermore, Sunwater have established arrangements for the funding of two water quality research offset projects with Central Queensland University (CQU), comprising: • PhD: Efficient nutrient monitoring framework for tropical impoundments, commencing early 2026 and concluding end 2029 (commencement date was

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
			rescheduled due to an unanticipated delay). • Masters: Taxonomic composition of microalgae following freshwater impoundment and identification of cost-effective monitoring options. The masters commenced in August 2024 as scheduled and is due to be completed by August 2026. Additional actions were undertaken during the current compliance period to assess water quality offset projects including evaluation of LIDAR data and soil nitrogen content at a range of sites in the Fitzroy Basin. The streambank repair site on the Burnett River was discontinued as it did not meet additionality requirements of DCCEEW. Sunwater continues to review its water quality offset options, and this will be reported 2 years after operations commenced and consider the level of nitrogen impact identified through monitoring. <i>Aquatic Species Offset Management Plans (incorporating Fitzroy River Turtle nest sites and aquatic habitat)</i> The OMP was approved on 8 January 2024. Actions undertaken during the

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
			current compliance period included, under the <i>Fitzroy River Turtle Nest Protection Management Plan</i> and <i>Expanded Feral Pest Animal Management Plan</i> are outlined below. Landholder events were conducted at Duaringa on 02 April 2025, and Gogango on the 03 April 2025. Activities completed under the <i>Fitzroy River Turtle Nest Protection Plan</i> include: ○ Ongoing nest protection works since the 31/07/2025 at priority nest protection areas, Hanrahan's Crossing, Rookwood Weir Downstream and Foleyvale. ○ A total of 10 intact nests and 217 eggs have been relocated to communal nest protection cages due to high risk of inundation / predation. Communal nest protection areas are ring fenced with electric fence and continually monitored weekly for any signs of predators / public attempting to open cage. Weed management is undertaken to prevent root shoots impacting clutches or inhibiting movement of hatchlings to the water's edge. ○ Ongoing survey of all nest protection areas for any predated nests that will inform priority nest

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
			protection areas within the 2026 Annual Nest Protection Plan. Activities completed under the <i>Expanded Feral Pest Management Plan</i> include: ○ 1080 baiting conducted on private property adjoining Hanrahan's crossing on the 26/08/2025. ○ Aerial cull conducted on the 15/09/2025, with a total of 67 pigs and 2 dogs culled on private property adjoining priority nest protection areas: Foleyvale, The Pocket and Rookwood Weir downstream. Sunwater identified non-compliances with some elements of condition 5 relating to the implementation of the management plan. These were reported to DCCEEW under Condition 19 on 17 September 2025. Refer to Appendix A for a summary of corrective measures taken or planned to be completed. The legal mechanism to secure the offset area (Stoney Creek and Foleyvale properties) was required to be executed by 20 August 2024, in accordance with Section 12 of the EPBC Act Environmental Offsets Policy (EOP).

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
			Although Sunwater executed agreements (Call option for Offset Deed) with the landowners on 6 February 2024, the declared area under the <i>Vegetation Management Act 1999</i> (Qld) (VMA) has not yet been made. As a result, there has been a failure to comply with a timing commitment made in the Terrestrial OMP due to administrative and legal factors.
6	Fitzroy River Turtle a) The approval holder must submit for the Minister's written approval, a separate species management plan to minimise impacts on the Fitzroy River turtle (<i>Rheodytes leukops</i>) for each weir to be constructed or raised b) The species management plan for each weir must: - be developed in consultation with DES and be in accordance with Appendix E of the AEIS; - detail how the population and habitat for the Fitzroy River turtle will be protected during construction and operation of the action; - detail how, subject to compliance with the Queensland Fitzroy Basin Water Plan and the weir operating plan, the approval holder will manage weir storage levels within the impoundment of the relevant weir to minimise the inundation of Fitzroy River turtle nests; and - detail how the approval holder will manage the impoundment water levels of the relevant weir during the period from May to January to encourage high nesting positions and reduce the risk of nest inundation. c) The species management plan may include subplans relative to each development stage (if relevant). d) The approval holder must not commence construction or raising of a weir unless the species management plan for the relevant weir has been approved by the Minister in writing. The approved species management plan for each weir must be implemented.	Non-compliant	Sunwater has achieved compliance with the following items under Condition 6: Year 1 2024-25 of Rookwood Weir operations phase monitoring was conducted in accordance with the approved methodologies described in the Rookwood Weir Operations SMP (GHD, 2023). Year 1 2024-25 involved monitoring of turtle movement behaviour within the turtle passage constructed at Rookwood Weir, and broad scale monitoring at areas upstream and downstream of Rookwood Weir. Methods used for the turtle passage monitoring included turtle capture surveys, remote telemetry (acoustic and PIT) and camera monitoring, supported by inspectional and observational records. Broad-scale

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
			monitoring methods included turtle capture surveys and remote telemetry (acoustic). The methods used for these two distinct, but associated monitoring programs and timeframes for completion are described in the Rookwood Weir Operations Phase – Annual Turtle Monitoring Report 2024-25 (refer Sunwater website – Rookwood Weir Scheme). Sunwater received advice from the PIT Tag Advisor on 02/10/2025 that PIT tags used within the Turtle Movement Study are incompatible with installed PIT tag readers on the Rookwood turtle passage and fishlock. The PIT Tag Advisor recommended that improved tags be utilised moving forward, which will be adopted by Sunwater. Non-compliances with some elements of condition 6 relating to the implementation of the management plan were identified, and reported to DCCEEW under Condition 19 on 17 September 2025. Refer to Appendix A for a summary of corrective measures taken or planned to be completed. Sunwater did not carry out the feral predator management program as scheduled and did not conduct nest

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
			monitoring in the 2024 nesting season, contrary to the commitments in the Turtle Management plans. The Plan's predator control actions (e.g. baiting in winter 2024, aerial culling) were largely delayed or not undertaken in 2024. Baiting of wild dogs/foxes was abandoned on some properties due to landholder concerns about using poison baits, and alternative control methods were slow to initiate. Baiting was undertaken on 26 August 2025, where access was permitted. An aerial cull originally planned earlier was conducted on 15 September 2025.
7	Turtle passage infrastructure a) At each weir to be constructed or raised, the approval holder must: i. construct turtle passage infrastructure (suitable for the Fitzroy River turtle) before the commencement of operation of the relevant weir; ii. construct turtle passage infrastructure at the relevant weir site in accordance with a design informed by the turtle movement study (at conditions 7b) and 7c)); iii. ensure turtle passage infrastructure and weir design and operation minimise the incidence of turtle injury; iv. monitor the effectiveness of the turtle passage infrastructure against the success criteria approved by the Minister (at conditions 7c) iii. and 7d)) twelve months after the construction of the relevant weir; and v. report to DES on the effectiveness of the turtle passage infrastructure in relation to the turtle movement success criteria, (taking account of wet and dry seasons and a full year of turtle movement, breeding and nesting distribution) twelve months after the construction of the	Compliant	As per Condition a) part iv and the approved Aquatic Species Conservation Summary Report, monitoring of the turtle passage infrastructure has been ongoing throughout the reporting period. Reporting for this aspect is included in the Rookwood Weir Turtle Monitoring Report (Refer Sunwater website – Rookwood Weir Scheme)

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
	relevant weir and thereafter annually and include a copy as part of the annual environmental report required under condition 10. b) Before finalising the design of turtle passage infrastructure for each weir (condition 7), the approval holder must undertake a turtle movement study for the relevant weir (Study), in accordance with the AEIS and Addendum to the AEIS, to collect baseline data for relevant sections of the Fitzroy River. c) The Study for each weir must: - be prepared and undertaken by a suitably qualified person in accordance with a methodology determined in consultation with DES; - collect data on seasonal movement patterns and home ranges of the Fitzroy River turtle. The study must include wet and dry season movements, breeding periods and nesting distribution; and - inform the development of criteria for demonstrating successful movement of Fitzroy River turtles around the relevant weir (success criteria). d) The approval holder must not commence the construction of turtle passage infrastructure at the Eden Bann or Rookwood Weir sites unless the success criteria for the relevant weir have been approved by the Minister. The approval holder must provide written advice to the Minister on how DES's advice has been addressed for each weir prior to submitting the success criteria for approval. e) The turtle passage infrastructure design and success criteria approved under condition 7d) must be applied to the Eden Bann Weir or Rookwood Weir, as relevant. f) The monitoring and reporting of the effectiveness of the turtle passage infrastructure (condition 7a) iv.) must be undertaken by a suitably qualified person and externally peer reviewed. g) If the monitoring specified by conditions 7a) iv. and 7a) v. fails to demonstrate that the success criteria are being met, the turtle passage		

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
	infrastructure must be modified in accordance with advice provided by DES with the aim of achieving the success criteria. h) The approval holder must maintain the operation of the turtle passage infrastructure while the relevant weir remains in operation and provide for the safe access by officers of DES and the Department to the weir infrastructure (including the turtle passage) for monitoring and compliance purposes. i) If the monitoring specified by condition 7a) iv. Demonstrates that the success criteria are not being met, the approval holder must implement an ongoing catch and release program for the Fitzroy River Turtle until the criteria are met. j) The catch and release program must ensure complete, safe turtle passage upstream and downstream of the relevant weir site. k) The catch and release program must be prepared and implemented by a suitably qualified person in accordance with a methodology determined in consultation with DES. l) In relation to the raising of Eden Bann Weir, the approval holder must undertake construction works at Glenroy Crossing outside of the nesting (September to November) and hatching (December to February) seasons for the Fitzroy River Turtle, unless surveys required by condition 7m) fail to identify the presence of turtle nests. m) Prior to undertaking construction works at Glenroy Crossing (condition 7 (l)), a suitably qualified person must undertake surveys for Fitzroy River Turtle nests, gravid females, and hatchlings within 100 meters of Glenroy Crossing. n) If any Fitzroy River Turtle nests, gravid female turtles and/or hatchlings are identified during surveys referred to in condition 7m), the approval holder must undertake management protocols to avoid and/or minimise disturbance to turtles.		
8	Standard conditions	Compliant	Notice of commencement was provided to DAWE (now DCCEEW) on 22 July 2020. Action commenced 17 July 2020.

Condition Number/ Reference	Condition	Compliance Status	Evidence/Comments
	Within 5 business days after the commencement of the action, the approval holder must advise the Department in writing of the actual date of commencement of the action.		
9	The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the management plan, program, strategy, or code of practice required by this approval, and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media	Compliant	Sunwater has maintained records substantiating all activities associated with or relevant to the conditions of approval.
10	Within three months of every 12-month anniversary of the commencement of the action, the approval holder must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of any management plans as specified in the conditions. Documentary evidence providing proof of the date of publication must be provided to the Department at the same time as the compliance report is published.	Compliant	The 2025 Compliance Report was uploaded to the Sunwater website in October 2025 (Sunwater website – Rookwood Weir Scheme) and evidence provided to the Department on 17 October 2025.
11	Upon the direction of the Minister, the approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister. The independent auditor and audit criteria must be approved by the Minister prior to the commencement of the audit. The audit report must address the criteria to the satisfaction of the Minister.	Not applicable	This did not occur during the reporting period. Sunwater voluntarily nominated to undertake a proactive internal review as part of Sunwater's environmental management system to assess compliance with all EPBC Approval conditions for LFRIP's first year of operations.
12	The approval holder may choose to revise a management plan, program or code of practice approved by the Minister under conditions 1, 2, 5 and 6 without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the revised plan, program or code of	Compliant	On 2 July 2025 Sunwater submitted revisions to the Land Management Code of Practice (LMCOP) under EPBC

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
	practice would not be likely to have a new or increased impact. If the approval holder makes this choice they must: a) notify the Department in writing that the approved action management plan has been revised and provide the Department with: i. an electronic copy of the revised plan, program, or code of practice; ii. an electronic copy of the revised plan, program or code of practice marked up with track changes to show the differences between the approved revised plan, program or code of practice and the revised plan, program, or code of practice; iii. an explanation of the differences between the approved revised plan, program or code of practice and the revised plan, program, or code of practice; iv. the reasons the approval holder considers that taking the action in accordance with the revised plan, program, or code of practice; would not be likely to have a new or increased impact; and v. written notice of the date on which the approval holder will implement the revised plan, program, or code of practice; (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the revised plan, program or code of practice, or a date agreed to in writing with the Department. b) subject to condition 15, implement the revised plan, program, or code of practice from the RAMP implementation date.		Approval Condition 12 via email to the DCCEEW Post Approvals Team. The revisions resolved ambiguity and clarified the existing intent of the LMCOP, making it clear that alternative practices are permitted in the limited circumstances identified in the new section 4.4 of the LMCOP where the prescribed Best Management Practice Actions (BPMAs) are not appropriate. The revisions did not change the operation of LMCOP and were not likely to have a new or increased impact. DCCEEW approved the revisions which were communicated to stakeholders via the LMCOP Stakeholder Workshop held in August 2025 and via publication of the revised LMCOP to the Sunwater website – Rookwood Weir Scheme.
13	The approval holder may revoke their choice under condition 12 at any time by notice to the Department. If the approval holder revokes the choice to implement a plan, program, or code of practice, without approval under section 143A of the EPBC Act, the plan, program, or code of practice previously in force must be implemented.	Not applicable	This did not occur during the reporting period.

Condition Number/ Reference	Condition	Compliance Status	Evidence/Comments
14	Condition 12 does not apply if the revisions to the approved plan, program or code of practice include changes to environmental offsets provided under the plan, program, or code of practice in relation to a matter protected by a controlling provision for the action, unless otherwise agreed in writing by the Minister. This does not otherwise limit the circumstances in which the taking of the action in accordance with a revised plan, program or code of practice would, or would not, be likely to have new or increased impacts.	Compliant	No other revisions of management plans, reports or strategies has occurred within the scope of this compliance report.
15	If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the revised plan, program or code of practice would be likely to have a new or increased impact, then: a) Condition 12 does not apply, or ceases to apply, in relation to the plan, program or code of practice; and b) The approval holder must implement the plan, program or code of practice specified by the Minister. To avoid any doubt, condition 15 does not affect any operation of conditions 12, 13 and 14 in the period before the day the notice is given. At the time of giving the notice the Minister may also notify that for a specified period of time that condition 12 does not apply for one or more specified plan, program or code of practice required under the approval.	Not applicable	The Minister did not give a notice to Sunwater.
16	Conditions 12, 13, 14 and 15 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised plan, program, or code of practice to the Minister for approval.	Not applicable	Note only.
17	If, at any time after 5 years from the date of this approval, the approval holder has not substantially commenced the action, then the approval holder must not commence the action without the written agreement of the Minister.	Compliant	Notice of commencement was provided to DAWE (now DCCEEW) on 22 July 2020. Action commenced 17 July 2020.
18	Unless otherwise agreed to in writing by the Minister, the approval holder must publish all management plans, reports, strategies, or codes of practice referred to in these conditions of approval on their website. Each management plan, report, strategy, or code of practice must be published	Compliant	Approved management plans are available on the Sunwater website: Sunwater website – Rookwood Weir Scheme

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
	on the website within 15 business days of being approved by the Minister or being submitted under condition 12a).		
19	Reporting Compliance 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 approved 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: - any 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. In the event the exact information cannot be provided, provide the best information available.	Compliant	No non-compliance reporting occurred during the reporting period. Non-compliances with elements of conditions, including the implementation of management plans or other measures required by those conditions, were identified on 15 September 2025 through an internal review of Sunwater's compliance with the approval conditions. The Department was notified via email and an attached letter to the Environmental Compliance Team on 17 September 2025 (Condition 19) with the specified information. A follow-up notification was provided via email and attached letter on 29 September (Condition 20). A summary detailing corrective measures taken or planned to be taken is provided in Table 1. Only one (1) Incident was reported during the reporting period in relation to the observation of a single turtle mortality, cause of death unknown: 04/11/2024 - 1 x Turtle Mortality (Adult Fitzroy River Turtle, unknown gender) observed right bank, downstream of weir wall.

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
20	The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in an approved plan 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.	Compliant	No non-compliance reporting occurred during the reporting period. Non-compliances with elements of conditions, including the implementation of management plans or other measures required by those conditions, were identified on 15 September 2025 through an internal review of Sunwater's compliance with the approval conditions. The Department was notified via email and an attached letter to the Environmental Compliance Team on 17 September 2025 (Condition 19) with the specified information. A follow-up notification was provided via email and attached letter on 29 September (Condition 20). A summary detailing corrective measures taken or planned to be taken is provided in Table 1. Only one (1) Incident was reported during the reporting period in relation to the observation of a single turtle mortality, cause of death unknown: • 04/11/2024 - 1 x Turtle Mortality (Adult Fitzroy River Turtle, unknown gender) observed right bank, downstream of weir wall.
21	Interpretation The action may be constructed and operated in two stages. Each stage comprises the construction or raising of one weir, the consequent inundation of the impoundment created by that weir and any ancillary works	Not applicable	Note only.

Condition Number/Reference	Condition	Compliance Status	Evidence/Comments
	required in order to raise or construct the particular weir and the operation of that weir and ancillary infrastructure. To allow the proposed action to be so staged, and notwithstanding any condition in this Approval to the contrary, each condition in this Approval is to be read, interpreted, and implemented so as to apply only to the relevant weir that is to be constructed or raised.		

Appendix A – Correcting Non-compliances

Non-compliances with elements of conditions, including the implementation of management plans or other measures required by those conditions, were identified on 15 September 2025 through an internal review of Sunwater's compliance with the approval conditions of the Lower Fitzroy Infrastructure Project (LFRIP).

In accordance with EPBC Approval 2009/5173 DCCEEW were initially notified of identified non-compliances via email to the Environmental Compliance Team on 17 September 2025 (Condition 19) with a follow-up notification provided via email on 29 September (Condition 20).

A summary detailing corrective measures taken or planned to be taken is provided in Table 1.

Table 1. Summary of corrective measures taken or planned to be completed

Corrective actions or measures COMPLETED or PLANNED to address a non-compliance and/or avoid recurrence:	Date/ timeframe	Status	Responsible for action:
Condition 1(a) Water Quality Monitoring and Reporting Program (WQMRP) - 11. Assessment, Adaptation and Reporting			
- Assessment of all water quality data - Engagement of independent Consultant - Finalisation of Reporting Tools - Ongoing Monthly Assessment and Investigation	29 Sept 2025	Completed	General Manager, Operations Central
- Submission of Annual Water Quality Monitoring Report (AWQMR) for the period 17 July 2024 -16 July 2025, including review of proposed program changes. - Submission of Monthly Water Quality Exceedance Investigation Report for the period April 2024 -July 2025.	17 Oct 2025	Completed	
Condition 1(a) Water Quality Monitoring and Reporting Program (WQMRP) - 8.2.1 Agricultural Event Monitoring – River Sites			
- Implementation of Flow Trigger Notification System - Implementation of ‘Monthly Quality Assurance Check’ to monitor Sampling Analysis Plan (SAP) Compliance	25 Sept 2025	Completed	General Manager, Operations Central
Finalisation of SAP to ensure effective implementation of the WQMRP.	17 Oct 2025	Completed	
Engage with DCCEEW where AWQMR and subsequent internal review identifies a need for changes to the WQMRP requiring Ministerial approval.	17 Jan 2026	Planned	
Condition 2(a) and (b) Land Management Code of Practice - 3. Farm Plan			

Corrective actions or measures COMPLETED or PLANNED to address a non-compliance and/or avoid recurrence:		Date/ timeframe	Status	Responsible for action:
• DCCEEW approval of revisions to the LMCOP under EPBC Approval Condition 12 acknowledging that on-site farm practices alternative to those expressed in sections 4.1 to 4.4 of the LMCOP may nevertheless satisfy the requirements of the LMCOP where certain conditions are met. • Submission of Annual Workshop LMCOP revision to DCCEEW • Outstanding Farm Plans – Organise site visit by Sunwater SQP to those farms with outstanding farm plans to document current status and provide feedback to achieve full compliance. • Outstanding Farm Plans – Progress Riverton/Rookwood Farm Plan to fully compliant LMCOP Farm Plan or BPTP. • Outstanding Farm Plans – Progress Yarra Farm Plan to fully compliant LMCOP Farm Plan or BPTP. • Administration of LMCOP Compliance - Develop and document the Sunwater process (including roles and responsibilities) for the following LMCOP actions: ○ Oversight of Customer provision of annual compliance statement (where an approved Farm Plan exists); ○ Oversight of Customer compliance with BPTP, including farm visits by Sunwater SQP (where BPTP exists); and ○ Farm Plan development, review and approval for new water purchasers.		31 Jul 2025	Completed	General Manager, Operations Central
		20 Dec 2025	Planned	
		31 Oct 2025	Planned	
		30 Nov 2025	Planned	
		31 Jan 2026	Planned	
		20 Dec 2025	Planned	
Condition 5(a) and (c) Offset Management Plans (OMP) – Delay in legally securing offset areas (Terrestrial OMP)				
• Multiple site visits by Sunwater and funding of technical support (e.g. Black Ironbox seed collection in Oct 2024) to demonstrate ongoing commitment to implementing the proposed offset areas. • Frequent contact by Sunwater's solicitors with the legal representatives of proposed offset area sites, and with the State Department, to actively pursue the finalisation of the Declared Area under the VMA. • Meeting organised and attended by Sunwater representatives and proposed offset area managers to discuss implementation of offset area management. • Notify DCCEEW in writing that the offset areas have been legally secured.		FY25	Completed	General Manager, Operations Central
		FY25	Completed	
		25 Sept 2025	Completed	
		Once legally secured	Planned	
Condition 6(a) and (b) Various Plans - Feral Pest Management; Priority Nest Protection Area Monitoring; and Priority nest Protection Area Planning and Pre-nesting season work				
• Create dedicated Contract Administrator role to oversee all Rookwood Weir (Managibei Gamu) environmental programs, including turtle-related sub-programs and feral pest control activities. • Appoint new team member to Contract Administrator role. • Expanded Feral Pest Management Plan – Deliver ground baiting, targeting high-productivity PNPAs. • Expanded Feral Pest Management Plan – Deliver first round of aerial shooting around priority nesting sites. • Expanded Feral Pest Management Plan – Place and service cameras to strengthen baseline data and inform future control efforts.		Aug 2025	Completed	General Manager, Operations Central
		Oct 2025	Planned	
		26 Aug 2025	Completed	
		15 Sept 2025	Completed	
		Ongoing	Completed	

Corrective actions or measures COMPLETED or PLANNED to address a non-compliance and/or avoid recurrence:	Date/ timeframe	Status	Responsible for action:
Expanded Feral Pest Management Plan – Voluntarily increase works footprint to encompass a 2km buffer, where supported by the landholder.	Ongoing	Completed	
Community Engagement – Organise and host additional community meeting in Gogango to encourage further landholder participation in the Feral Pest Works program	30 Oct 2025	Planned	
Facilitate and deliver freshwater turtle training by industry-leading experts for contractors engaged under Indigenous Land Use Agreement (ILUA) Ancillary Deed.	2-3 Oct 2024 19-20 Jun 2025	Completed	
Land Access Agreements – Finalise five Land Access Agreements to enable works to proceed in key areas adjoining PNPAs.	15 Sept 2025	Completed	
- Expanded Feral Pest Management Plan – Consider additional rounds of aerial shooting where landholder access remains limited. - Expanded Feral Pest Management Plan – Trial alternative feral pig management methods within asset boundaries - Community Engagement – Progress targeted communications and consultation with remaining Landholders in known PNPA areas to encourage further expansion of feral pest management works - Utilise 2025 nesting data to inform PNPA monitoring within subsequent years for targeted monitoring and improved success rates during Planning meeting. - Third party QA/QC audit of Annual Turtle Nest Protection Plan and Annual Turtle Nest Protection report during FY26.	FY26	Planned	
Provide regular updates to DCCEEW during quarterly compliance meetings.	FY26	Planned	