



OLIVE DOWNS PROJECT WATER PIPELINE

Annual Compliance Report

Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act)

EPBC Approval Reference: 2017/7868



1. Introduction

1.1 Project Context

The Olive Downs Water Pipeline (the Project) is a water supply infrastructure component of the Olive Downs Mine located approximately 40 km south-east of Moranbah in the Bowen Basin, Queensland. The Project involves the development of a water pipeline branching from the existing Eungella pipeline network to supply process water to the Olive Downs Coal Mine.

The pipeline corridor traverses a mix of land tenures. The eastern section is contained within Mining Lease 700035 (held by Pembroke) and the western section traverses private freehold, local government, and state-owned land, secured through commercial access and easement arrangements. The pipeline was assessed as part of the environmental impact statement process conducted under the *State Development and Public Works Organisation Act 1971* (Qld).

EPBC Approval 2017/7868 is an infrastructure approval, granted on 14 April 2020 and in effect until 4 December 2123, and operates in conjunction with the main Olive Downs Coal Mine approval (EPBC 2017/7867).

1.2 Project Location and Land Tenure

The pipeline corridor extends from a connection point on the existing Eungella pipeline network approximately 40 km south-east of Moranbah to the Olive Downs Coal Mine site. The corridor is partially located within Pembroke's Mining Lease 700035 and on land held by third parties via commercial agreement.

The Project area is defined in the approval as 'Olive Downs Project Water Pipeline (EPBC 2017/7868)' in Attachments A to E of the approval instrument, which map listed threatened species habitat along the corridor.



Figure 1 – EPBC 2017/7868 Location

1.3 Purpose and Reporting Period

This Annual Compliance Report (ACR) has been prepared by Pembroke Olive Downs Pty Ltd to satisfy Condition 14 of EPBC Approval 2017/7868 under the EPBC Act.

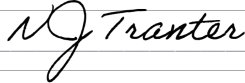
1.4 Approval Holder Details

Organisation	Pembroke Olive Downs Pty Ltd
ACN	611 674 376
Project	Olive Downs Project Water Pipeline
EPBC Reference	2017/7868
Date of Approval	14 April 2020
Controlling Provisions	EPBC Act ss 18 and 18A (Listed Threatened Species and Communities)
Approval Valid Until	4 December 2123
Address	Suite 2, Level 32, 239 George Street, Brisbane, Qld, 4000
Contact Name	Ngaire Tranter, Head of Approvals & Environment
Telephone	07 3177 4940
Email	environment@pembrokeresources.com.au
Website	www.pembrokeresources.com.au

1.5 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) 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 information and documentation supporting this Annual Compliance Report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed	
Full Name	Ngaire Tranter
Position	Head of Approvals & Environment
Organisation	Pembroke Olive Downs Pty Ltd
Date	30 June 2026

2. Description of the Approved Action and Activities

2.1 The Approved Action

The approved action is the development of a water pipeline branching from the existing Eungella pipeline network approximately 40 km south-east of Moranbah, Queensland, as varied by the Minister under section 156B of the EPBC Act on 17 April 2018 (variation request dated 21 December 2017). The approval was granted under sections 130(1) and 133(1) of the EPBC Act for the purposes of sections 18 and 18A (Listed Threatened Species and Communities).

The approval authorises the clearance of listed threatened species habitat within the pipeline corridor, subject to the maximum clearance limits set out in Condition 1. Table 2 below summarises those limits.

Table 2. Maximum Clearance Limits — Condition 1, EPBC 2017/7868

Listed Threatened Species Habitat	Maximum Clearance
Koala (<i>Phascolarctos cinereus</i>) (combined populations of Qld, NSW and the ACT)	28 ha
Greater Glider (<i>Petauroides volans</i>)	28 ha
Squatter Pigeon (Southern) (<i>Geophaps scripta scripta</i>) — breeding habitat	15 ha
Squatter Pigeon (Southern) (<i>Geophaps scripta scripta</i>) — foraging habitat	6.5 ha
Ornamental Snake (<i>Denisonia maculata</i>) — important habitat	8 ha
Australian Painted Snipe (<i>Rostratula australis</i>) — breeding habitat	1 ha

Environmental offsets compensating for this clearance are provided through the Stage 1 OAMP (Condition 3), which is shared with EPBC 2017/7867 and was approved by the Minister in December 2020. The offset areas are located at Iffley Station (Lot 11 on Plan KL135) and Pembroke-owned land (Lots 5 and 18 on Plan SP113322) in the Bowen Basin.

2.2 Activities Undertaken During the Reporting Period

The following key activities were undertaken during the reporting period (20 April 2025 – 19 April 2026):

- Management of the pipeline corridor across its mixed land tenure, including ongoing compliance with easement and access conditions on private freehold, local government, and state-owned land.
- Management of Stage 1 environmental offsets (shared with EPBC 2017/7867) in accordance with the Stage 1 OAMP approved December 2020, including Year 4 annual offset monitoring activities.
- Execution and registration of the Voluntary Declaration (legally binding mechanism) over part of Lots 5 SP113322 and 11 KL135 as areas of high nature conservation value, approved by the Queensland Department of Natural Resources and Mines, Manufacturing, and Regional and Rural Development on 25 June 2025 (Condition 5).
- Notification to DCCEEW of the administrative non-compliance relating to prior ACR reporting under consolidated 7867 reports (Conditions 15 and 16), and publication of standalone Years 1–3 ACRs on Pembroke's website.
- Commencement of reviews regarding pipeline infrastructure design and commercial arrangements to assess whether completion of the action can be determined in the next reporting year (Condition 21).

3. Compliance Report Requirements

3.1 Conditions of Approval

Condition 14 of EPBC Approval 2017/7868 requires Pembroke to prepare a compliance report for each 12-month period following the date of commencement of the action. The report must be published on Pembroke's website within 60 business days of the end of each reporting period, with notification to the Department within 5 business days of publication. Where sensitive ecological data has been excluded from the published version, the full report must be submitted to the Department within 5 business days of publication.

3.2 Alignment with DCCEE Annual Compliance Report Guidelines (2023)

This Report has been prepared in accordance with the DCCEE Annual Compliance Report Guidelines (2023). The compliance report definition in Condition 14 of the approval references the Department's Annual Compliance Report Guidelines (noting the original approval cited the 2014 version; the current 2023 revision has been applied). Table 3 cross-references each Guideline requirement to the relevant section of this Report.

Table 3. Alignment with DCCEE Annual Compliance Report Guidelines (2023)

Guideline Requirement	Reference in this Report
EPBC number	EPBC 2017/7868 — Cover page, Section 1.3
Project name	Olive Downs Project Water Pipeline — Cover page, Section 1.1
Approval holder and ACN	Pembroke Olive Downs Pty Ltd ACN 611 674 376 — Section 1.4
Description of the approved action	Section 2
Location of the project	Section 2
Person accepting responsibility — declaration	Section 1.5
Dates for the reporting period	Section 1.3
Date of preparation	Cover page
All conditions listed with compliance designation	Appendix A — Table 1
Management plan specifics and evidence	Appendix A — Table 1
Corrective actions and new environmental risks	Section 5
Sensitive ecological data excluded	Public version — excluded per Condition 14(d)

4. Project Compliance

The compliance of the Project with all 21 conditions of EPBC Approval 2017/7868 during the reporting period is presented in Appendix A (Table 1). A summary of outcomes is provided below.

Table 4. Summary of Compliance Outcomes

Compliance Designation	Conditions
Compliant	14
Non-Compliant	0
Not Applicable	7
Total Conditions	21

Conditions assessed as Not Applicable relate to obligations that were not triggered during the reporting period. These include: Condition 11 (Departmental request for compliance records — no request received); Conditions 12 and 13 (preparation and publication of plans and submission of monitoring data — no new or revised plans required); Condition 17–19 (independent audit — no audit requested by the Minister); and Condition 20 (OAMP revision — no variation was sought or required during the period).

5. Corrective Actions and New Environmental Risks

5.1 Administrative Non-Compliance: Standalone ACR Reporting (Conditions 15 and 16)

Prior to the current reporting period, annual compliance reporting for EPBC 2017/7868 had been addressed in a consolidated manner within the Annual Compliance Reports prepared for the main mine approval (EPBC 2017/7867). While the material compliance content was captured in those reports, the approval conditions for EPBC 2017/7868 requires standalone reporting to occur.

Upon identifying this administrative matter, Pembroke made a formal written notification to DCCEEW pursuant to Condition 15. The notification identified the conditions potentially in breach and provided a short description of the non-compliance.

In accordance with Condition 16, within 10 business days Pembroke provided DCCEEW with full details of the corrective action taken and the remediation timeline. The corrective actions comprised:

- Preparation and publication of standalone Annual Compliance Reports for Years 1, 2 and 3 of EPBC 2017/7868 on Pembroke's website within the agreed timeframe; and
- Submission of the full versions of each report to DCCEEW within 5 business days of publication, in accordance with Condition 14(e).

All corrective actions have been completed. The current report (Year 4) is the first ACR prepared as a standalone document from the outset of the reporting period. Pembroke considers this matter fully resolved. No further corrective action is required.

5.2 New Environmental Risks

No new environmental risks beyond those identified in the approved Stage 1 OAMP and associated management plans were identified during the reporting period. The water pipeline continued to operate within its approved corridor across all land tenure types, and in accordance with all relevant management commitments, easement conditions, and access agreements. No exceedances of any trigger values or limits were recorded during the period.

Pembroke notes that reviews of water pipeline infrastructure design and commercial arrangements are underway to assess whether completion of the action (as defined in the approval) may be determinable within the next reporting year.

6. References

- EPBC Act Approval 2017/7868 — Olive Downs Project Water Pipeline (granted 14 April 2020, in effect until 4 December 2123).
- EPBC Act Approval 2017/7867 — Olive Downs Project Mine Site and Access Road (including Variation to Conditions, dated 8 August 2025).
- Stage 1 Offset Area Management Plan (OAMP), approved by the Minister 23 December 2020 (shared approval under EPBC 2017/7867 and EPBC 2017/7868), and Year 4 Annual Report.
- Annual Compliance Reports — EPBC 2017/7868, Years 1, 2 and 3 (published on Pembroke's website during the reporting period).
- DCCEE Annual Compliance Report Guidelines (2023).
- Department of Agriculture, Water and the Environment, Guidelines for biological survey and mapped data (2018).
- EPBC Act Environmental Offsets Policy (2012, and subsequent revisions).

Appendix A — Compliance Table

Table 1 presents the compliance assessment for all 21 conditions of EPBC Approval 2017/7868 for the reporting period 20 April 2025 to 19 April 2026, consistent with the DCCEEW Annual Compliance Report Guidelines (2023). The conditions are grouped by Part A (conditions specific to the action) and Part B (standard administrative conditions) as structured in the approval instrument.

Compliant	All requirements of a condition have been met, including implementation of management plans or other measures required by those conditions.
Non-Compliant	The requirements of a condition or elements of a condition, including management plans and other measures, have not been met.
Not Applicable	The requirements of a condition or elements of a condition fall outside the scope of the current reporting period.

Table 1. EPBC 2017/7868 — Conditions of Approval, Compliance Status (20 April 2025 – 19 April 2026)

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
Maximum Clearance Limits				
1	Maximum Clearance Limits	The approval holder must not clear outside of the project area and must not clear more than: a. 28 hectares (ha) of Koala (<i>Phascolarctos cinereus</i>) (combined populations of Qld, NSW and the ACT) habitat; b. 28 ha of Greater Glider (<i>Petauroides volans</i>) habitat; c. 15 ha of Squatter Pigeon (Southern) (<i>Geophaps scripta scripta</i>) breeding habitat; d. 6.5 ha of Squatter Pigeon (Southern) (<i>Geophaps scripta scripta</i>) foraging habitat; e. 8 ha of Ornamental Snake (<i>Denisonia maculata</i>) important habitat; and f. 1 ha of Australian Painted Snipe (<i>Rostratula australis</i>) breeding habitat.	Compliant	No change from prior years' annual compliance reporting. The pipeline area was assessed as part of the environmental impact statement process conducted via the State Development and Public Works Organisation Act 1971. The eastern portion of the pipeline is contained within Mining Lease 700035 and the western portion is secured via commercial arrangements. The assessment determined maximum reasonable disturbance, and this was managed through the clearance process for the period.
Environmental Offset Requirements				
2	Environmental Offset Requirements	To compensate for the clearance of listed threatened species habitat as specified in condition 1, the approval holder must provide an environmental offset consistent with the Environmental Offsets Policy.	Compliant	No change from prior years' annual compliance reporting. The necessary environmental offset requirements form part of the Stage 1 Offset Area Management Plan (OAMP) approved by the Minister in writing in December 2020, which forms part of the overall Olive Downs Complex EPBC Approvals (EPBC Permit 2017/7867).
3	Environmental Offset Requirements	The approval holder must submit an Offset Area Management Plan (OAMP) prepared by a suitably qualified ecologist for the written approval of the Minister. The approval holder must not commence the action until the OAMP has been approved in writing by the Minister. The approved OAMP must be implemented.	Compliant	No change from prior years' annual compliance reporting. Addressed as part of condition 2, via the Stage 1 OAMP.
4	Environmental Offset Requirements	The OAMP must include the following information for the offsets required to compensate for the clearance of listed threatened species habitat as provided for in condition 1 in accordance with the principles of the Environmental Offsets Policy: a. a description of the offset, including location, size, condition,	Compliant	No change from prior years' annual compliance reporting. Addressed as part of condition 2, via the Stage 1 OAMP.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
	<i>Condition 4 continued</i>	environmental values present and surrounding land uses; b. baseline data, including results from field validation surveys, and quantifiable ecological data on habitat quality and other supporting evidence that documents the presence of each listed threatened species and the quality of each listed threatened species habitat within the offset area; c. an assessment of site habitat quality using a method agreed to in writing by the Department; d. details of how the offset area will provide connectivity with other habitats and biodiversity corridors and/or will contribute to a larger strategic offset for each listed threatened species; e. maps and shapefiles to clearly define the location and boundaries of the offset area, accompanied by offset attributes; f. specific offset completion criteria derived from the site habitat quality to demonstrate the improvement in the quality of each listed threatened species habitat in the offset area over the period of effect of this approval; g. details of the management actions, and timeframes for implementation, to be carried out to meet the offset completion criteria; h. interim milestones that set targets at 5-yearly intervals for progress towards achieving the offset completion criteria; i. details of the nature, timing and frequency of monitoring to inform progress against achieving the 5-yearly interim milestones; j. proposed timing for the submission of monitoring reports which provide evidence demonstrating whether the interim milestones have been achieved; k. timing for the implementation of corrective actions if monitoring activities indicate the interim milestones will not or have not been achieved; l. a risk analysis and a risk management and mitigation strategy for all risks to the successful implementation of the OAMP and timely achievement of the offset completion criteria, including a rating of all initial and post-mitigation residual risks in accordance with the risk assessment matrix; m. evidence of how the management actions and corrective actions take into account relevant approved conservation advices and are consistent with relevant recovery plans and threat abatement plans; and n. details of the legal mechanism for legally securing the offset		

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
		area, such that legal security remains in force over the offset area for at least the period of effect of this approval.		
Legal Securing of Environmental Offset				
5	Legal Securing of Environmental Offset	The approval holder must legally secure the environmental offset within 12 months from the date that the OAMP is approved by the Minister in writing. The approved OAMP must be attached to the legal mechanism used to legally secure the offset area.	Compliant	On 25 June 2025, the Department of Natural Resources and Mines, Manufacturing, and Regional and Rural Development approved the prior submitted Voluntary Declaration (legally binding mechanism (LBM)) on part of lots 5 SP113322 and 11 KL135 as areas of high nature conservation value. As per prior ACR reports the application was historically submitted in 2022 and subsequently revised and approved.
6	Legal Securing of Environmental Offset	The approval holder must notify the Department within 5 business days of the legal mechanism being executed.	Compliant	Notification of the LBM was conducted in keeping with the Project's main EPBC permit (2017/7867).
7	Legal Securing of Environmental Offset	The legal mechanism used to legally secure the offset area must remain in force for the period of effect of this approval.	Compliant	The LBM is listed on the associated property titles, as per the Stage 1 OAMP.
Notification of commencement				
8	Notification of commencement	The approval holder must notify the Department in writing of the date of the commencement of the action within 5 business days after the date of the commencement of the action.	Compliant	No change from prior years' annual compliance reporting. DCCEEW notification evidence provided within Year 1 ACR.
9	Notification of commencement	If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the written agreement of the Minister.	Compliant	Commencement of action occurred within the allocated timeframe.
Compliance Records				
10	Compliance Records	The approval holder must maintain accurate and complete compliance records.	Compliant	All relevant compliance records have been maintained to date.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
11	Compliance Records	If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.	Not applicable	No Departmental requests were made during the period.
Preparation and publication of plans				
12	Preparation and publication of plans	The approval holder must: a. submit plans electronically to the Department for written approval by the Minister; b. publish each plan on its website within 20 business days of the date of this approval or of the date a revised plan is approved by the Minister, unless otherwise agreed to in writing by the Minister; c. exclude or redact sensitive ecological data from plans published on its website or provided to a member of the public; and d. keep plans published on its website for the duration of this approval.	Not applicable	No updated or new plans were prepared or submitted during the period.
13	Preparation and publication of plans	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under condition 4, is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to the Department in accordance with the requirements of the plans within 2 months of each survey event.	Not applicable	There were no current publication obligations associated with this permit.
Annual Compliance Reporting				
14	Annual Compliance Reporting	The approval holder must prepare a compliance report for each 12 month period following the date of the commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must: a. publish each compliance report on its website within 60 business days following the relevant 12 month period; b. notify the Department by email that a compliance report has been published on its website within 5 business days of the date of publication; c. keep all compliance reports publicly available on its website for the duration of this approval;	Compliant	All historical reports have been provided to DCCEE and published on Pembroke's website. The current ACR has been prepared in keeping with the requirements of condition 14.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
		d. exclude or redact sensitive ecological data from compliance reports published on its website; and e. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication.		
Reporting Non-compliance				
15	Reporting Non-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 plans. The notification must be given as soon as practicable but no later than 2 business days after becoming aware of the incident or non-compliance. The notification must specify: a. the condition which is or may be in breach; and b. a short description of the incident and/or non-compliance.	Compliant	During the period Pembroke made a formal notification of the identification of an administrative non-compliance for ACR associated with the permit. Historically this had been treated as a consolidated report under Pembroke's main EPBC Permit (2017/7867).
16	Reporting Non-compliance	The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in the plans as soon as practicable but 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	Notification in accordance with condition 15 included full rectification of the issue identified which included historical ACRs for years 1 - 3 and publication of such to Pembroke's website.
Independent Audit				
17	Independent Audit	The approval holder must ensure that independent audits of compliance with the conditions of approval are conducted when requested in writing by the Minister.	Not applicable	No independent audits were requested during the period.
18	Independent Audit	For each independent audit, the approval holder must: a. provide the name and qualifications of the independent auditor and the draft audit criteria to the Department;	Not applicable	No independent audits were requested during the period.

No.	Category	Condition of Approval	Status	Evidence / Audit Summary
		b. only commence the independent audit once the audit criteria have been approved in writing by the Department; and c. submit an audit report to the Department within the timeframe specified in the approved audit criteria.		
19	Independent Audit	The approval holder must publish the audit report on its website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on its website for the duration of this approval.	Not applicable	No independent audits were requested during the period.
Revision of the OAMP				
20	Revision of the OAMP	The approval holder may, at any time, apply to the Minister for a variation to the OAMP approved by the Minister under condition 3, or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised OAMP (ROAMP) then, from the date specified by the Minister, the approval holder must implement the ROAMP in place of the previous approved OAMP.	Not applicable	No variations were made to the Stage 1 OAMP during the period.
Completion of the action				
21	Completion of the action	Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.	Compliant	Based upon the finalisation of the legally binding mechanism for the offsets occurring during the reporting period reviews of the water pipeline infrastructure design and commercials commenced to determine if completion of the action will be possible. This remains to be determined in the next reporting year.

END OF REPORT