






KGP.2373-PL-HSE-0001

KENS BORE GAS PIPELINE

**OPERATIONS ENVIRONMENT MANAGEMENT
PLAN SUMMARY**

Version Control and Authorisation					
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1. Introduction

This Operations Environment Management Plan (OEMP) Summary provides an overview of the environmental management requirements for the operation of the Kens Bore Gas Pipeline (KBGP).

The nominated operator for the listed pipeline is APT Goldfields Pty Limited (APA)

1.1 Purpose and Scope

The purpose of this OEMP Summary is to provide information to the public regarding environmental management requirements.

The scope of this OEMP Summary is limited to operational works associated with KBGP.

1.2 Health, Safety, Environment and Heritage Policy

At APA we strive to be world class in health, safety, environment and heritage performance. Our foremost priorities include protection of the environment, heritage and the communities we operate.

APA is committed to managing and minimising our impact on the environment and heritage. We foster a culture of responsibility, leadership and awareness of our environment and heritage obligations and practices.

1.3 Definitions

Table 1: Definitions

Acronym	Definition
AHIS	Aboriginal Heritage Information System
ALARP	As Low as Reasonably Practicable
APA	APA Group
DBCA	Department of Biodiversity Conservation and Attractions
DEMIRS	Department of Energy, Mines, Industry Regulations and Safety
DPIRD	Department of Primary Industries and Regional Development
DPLH	Department of Planning, Lands and Heritage
DWER	Department of Water and Environmental Regulation
ERA	Environmental Risk Assessment
ERP	Emergency Response Plan
ESA	Environmentally Sensitive Area
GGP	Goldfields Gas Pipeline
HAZOP	Hazard and Operability Study
HSE	Health Safety and Environment
IOC	Integrated Operations Centre
JHA	Job Hazard Analysis
KP	Kilometre Point
KBGP	Kens Bore Gas Pipeline
OEMP	Operations Environment Management Plan
OSCP	Oil Spill Contingency Plan
PL	Pipeline Licence
PTW	Permit to Work

Acronym	Definition
ROW	Right of Way
SDS	Safety Data Sheet
SWMS	Safe Work Method Statement
TPC	Third Party Contractor
WEAF	Works Environmental Assessment Form

2. Location

The KBGP commences at the Goldfields Gas Pipeline (GGP) (kilometre point (KP) 70.5) / Warrambo Creek Inlet Station tie in point and ends at the outlet flange at the Kens Bore Delivery Station. The length of the KBGP is approximately 15.6 km and has been laterally deviated through parts of the pipeline licence area (PL131) to facilitate construction (and avoid environmental sensitivities). Refer to Figure 1 for the KGBP locality map.

The pipeline traverses two miscellaneous licenses (LR3115/508 and LR3122/168) and a public road reserve (Mount Stuart-Red Hill Rd). The pipeline is located on unallocated Crown land and traverses one pastoral lot.

- Red Hill Pastoral Station (Lot 165 on Deposited Plan 238633)

The Pipeline is operated under PL131 and is expected to operate for the full life of the pipeline licence.

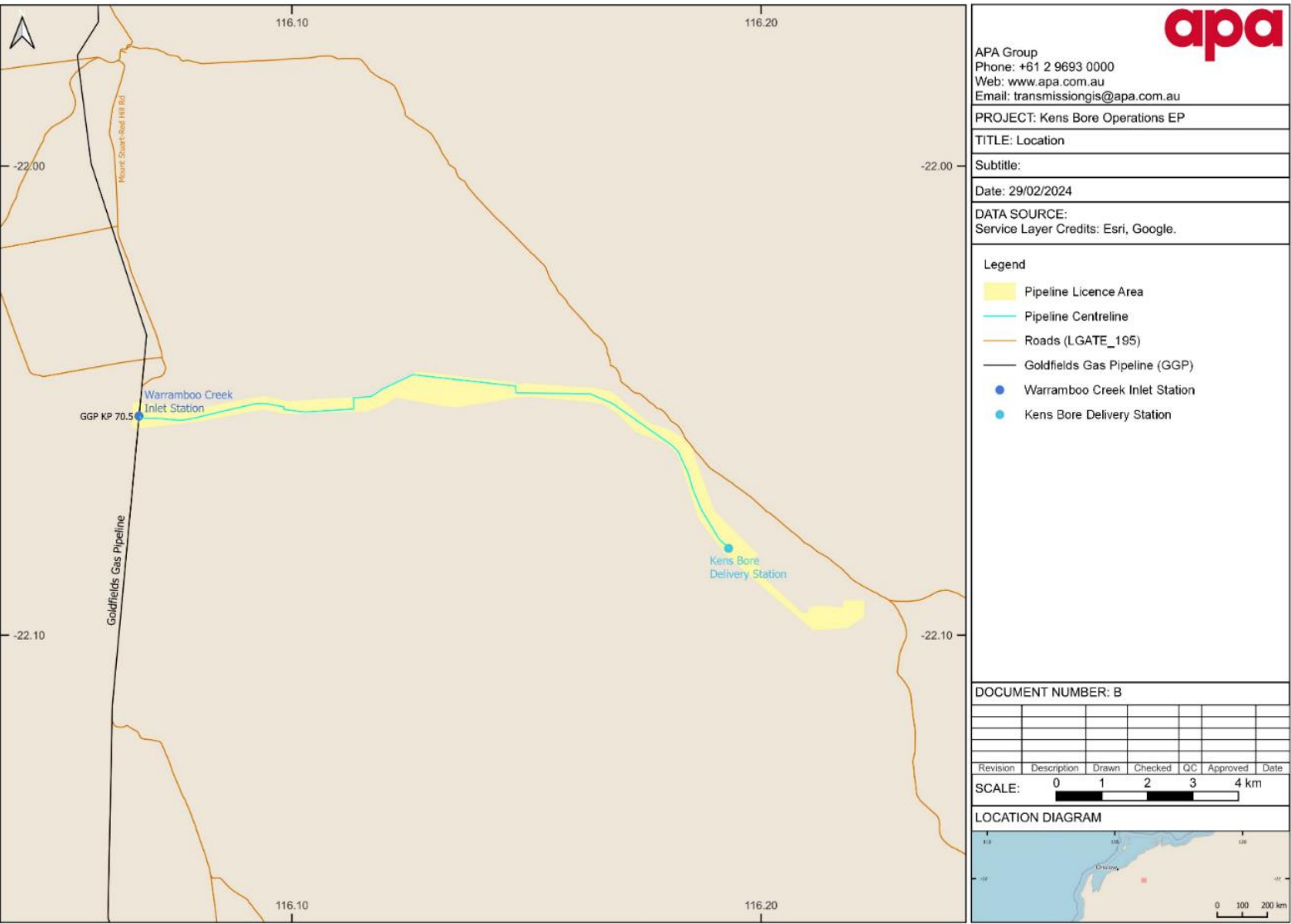


Figure 1 KBGP Locality Map

3. Activity Description

3.1 General Equipment, Easement and Facility Maintenance

General equipment, easement and facility maintenance includes the following:

- Servicing and overhauls of machinery and equipment;
- Equipment inspections and testing;
- Monitoring;
- Erosion management and remediation (inclusive of import of fill);
- Modification of fencing, include minor concreting for footings;
- Maintenance of temporary site offices, ablutions, laydown, and parking areas;
- Filter inspections and replacement; and
- Small scale facility works.

The above activities involve various mechanical and electrical tasks which are undertaken by appropriately qualified technicians.

Filter inspections are undertaken at regular intervals and filters replaced as required. Filter replacement involves filter removal, wash down with water and transfer to a secure container for transfer to appropriate offsite disposal facilities.

Pipeline warning signs are in accordance with AS2885. Signs are placed so as to be inter-visible and may require replacement.

Erosion and subsidence management requiring the import of fill, ground/surface compaction and the mobilisation of earth-moving machinery, may be required intermittently to ensure ongoing pipeline integrity. Fill will be clean of weeds and disease and sourced locally, where possible.

Small scale upgrades are required intermittently to allow for increased services or changes in pipeline requirements. Works may include minor concreting for footings, maintenance of temporary site offices, ablutions, laydown and parking areas to facilitate the small-scale installations. Works will be restricted to the pipeline licence area.

3.2 Pipeline Excavation

Pipeline excavations are undertaken periodically typically for pipeline repairs. The scales of excavations are generally single defect dig-ups.

Pipeline excavations are managed through Gas Transmission Excavation and Trenching Procedure.

Dewatering is sometimes required where the water table is present at less than a few metres from the ground surface, however this is rare (once every 5-10 years).

Abrasive blasting and coating activities may be conducted on an ad-hoc basis (likely once every ten years, based on similar APA pipelines).

3.3 Venting

Venting of gas is undertaken to purge pipelines or facilities for maintenance or emergency response purposes.

The Integrated Operations Centre Controller (IOC Controller) assists to monitor and respond to any unplanned/uncontrolled venting or gas release incidents via information provided on the on the operator interface (SCADA).

3.4 Pigging

3.4.1 Cleaning Pigging

Pigs are run between pipeline scraper stations containing pig launching and receiving facilities. Particulate matter separated from the gas stream is a common by-product of pigging (removal of which is the goal in the case of a cleaning pig run), these are caught in the pig receiver trap along with the recovered pig and contained for appropriate offsite disposal.

3.4.2 Intelligent Pigging

Currently intelligent pigging is not achievable on the KBGP due to pipe diameter. Pipeline integrity on the KBGP will be checked via a 5 yearly Direct Current Voltage Gradient (DCVG) survey. DCVG is a coating survey conducted by walking along the pipeline route with probes to detect electrical leakage from the pipeline (through coating defects).

3.5 Easement Inspections

Pipeline easement inspections are conducted as aerial or vehicle patrols. Scope of these patrols aim to identify:

- Third party encroachments;
- Vegetation growth;
- Indicators of gas leaks;
- Line of sight (LOS);
- Presence of weed infestation greater than land immediately adjoining the corridor;
- Erosion;
- Exposed pipe; and
- Condition of signage and aerial markers.

Easement inspections are completed on a 2 monthly or 12 monthly frequency (3P SS Easement) and ROW (Right of Way) Surveillance (aerial or vehicle patrol), or as per the Maximo (APA's Asset Management System) Maintenance Regime.

The vehicle patrol is conducted from light vehicles and managed through Maximo, with a Work Order (WO) being generated for completion. Any issues identified are documented and where necessary additional WO raised for corrective action to be completed.

The aerial patrol is undertaken via a contractor and any issues / occurrences that are recorded during the flight are uploaded into Field Maps (APA's GIS) directly by the contractor for APA to action. The contractors follow the Corridor Surveillance Procedure (APA-PR-QM-0004).

Any changes to the above frequencies will go through a Management of Change (MOC) process via Maximo prior to the change being in effect.

3.6 Hot Tapping

Hot Tapping is the process of safely drilling a hole into an operating gas pipeline to allow a connection to be made. Excavations are within the previously disturbed boundaries.

3.7 Vegetation Clearing

The PPA requires upstream and downstream pipeline warning markers to be visible (line of sight). In some areas, plant regrowth obscures line of sight between pipeline warning markers and inhibits vehicle access for maintenance purposes and emergency response. In these instances, vegetation mulching becomes necessary. The operation does not comprise soil disturbance and hence vegetative root stock and soil quality is maintained.

Vegetation disturbance may also be required to facilitate minor excavations/dig-ups.

Clearing will occur in accordance with the Environmental Protection (Clearing of Native Vegetation) Regulation 2004.

3.8 Pipeline Protection

Pipeline protection is required at crossings to ensure continued integrity of the pipeline is maintained. Pipeline protection by slabbing is a common practice. HDPE (high density polyethylene plastic) or concrete (either poured in situ or prefabricated) slabs can be laid over and/or under the pipeline underground at the crossing to protect the asset from external interference. Hydro-testing may also be required as part of this activity. Generally hydrotest water will be potable water.

3.9 Waste Management

General waste, contaminated waste, controlled waste and potentially NORMS waste are produced during the activity.

3.10 Vehicle Access

Vehicle activity predominantly comprises of light vehicles and occasional heavy vehicles for excavations, LOS clearing and associated maintenance activities. All access is restricted to the ROW and existing roads and tracks.

3.11 Planning for closure

APA will develop a separate environment plan for the decommissioning and rehabilitation of the KBGP which will be submitted to DEMIRS for review and approval prior to any work commencing for this activity.

APA closure objectives are for rehabilitated sites to be (physically) safe to humans and animals, stable, non-polluting / non-contaminating and capable of sustaining an agreed post-activity land use.

The pipeline owner commits to full removal of all property, equipment and infrastructure inline with Western Australian onshore areas and State coastal waters Guidelines (March 2024) (Decommissioning Guidelines). However, it is likely that the pipeline will be left *in situ* as removing the pipeline will likely result in greater harm to the environment. It is the pipeline owner's responsibility to make a sufficiently compelling case (including a comparative risk assessment) to the Minister for approval to leave the pipeline *in situ*, this will be done later as decommission approaches and more information is available.

4. Description of the Environment

4.1 Physical Environment

The KBGP is located within the Ashburton Basin, a sub-basin within the Hamersley subregion of the Pilbara Bioregion (Department of the Environment, 2012; Tille, 2006). The Ashburton Basin is an arcuate belt of Paleoproterozoic sedimentary and volcanic rocks which forms the northern margin of the Capricorn Orogen, a major orogenic zone between the Pilbara and Yilgarn Cratons (Thorne & Seymour, 1991).

These areas experience characteristic low rainfall and are dominated by rough shale hills, stony plains and broad drainage floors supporting hard spinifex grasslands and sparse shrubs (BOM, 2022).

4.1.1 Climate

The Ashburton Basin, within the Hamersley subregion, has a semi-desert to tropical climate, characterised by seasonal patterns of very hot summers and mild, wet winters (Thorne & Seymour, 1991; Department of Conservation and Land Management, 2002).

Average annual precipitation levels in Onslow is 303.7 mm, with the majority occurring between January and July, accounting for about 95.4% of the annual rainfall. The average monthly maximum temperatures in the region range from 25.6°C in July to 36.5°C in January. Average minimum temperatures range between 13.1°C in July to 25.1°C in February.

The Pilbara is within the most cyclone-prone region of Australia, with varied timing and amount of rainfall. From November to April (wet season), most areas of the Pilbara receive the summer rains associated with the Australian monsoon and occasional tropical cyclones (Sudmeyer 2016).

4.1.2 Topography, Geology and Soils

Landforms across the pipeline licence area can be described as rugged hills, ridges, dissected plateaux, and mountains that are found on the basalt, banded iron formation and sandstone of the Pilbara Landscape area. Long stony footslopes and plains are often associated with these hills (Tille, 2006).

The pipeline licence area intersects four broad soil systems:

- The Robe System; low plateaux, mesas and buttes of limonite supporting soft spinifex and occasionally hard spinifex grasslands;
- The Capricorn System; rugged sandstone hills, ridges, stony footslopes and interfluvies supporting low acacia shrublands or hard spinifex grasslands with scattered shrubs;
- The Houndstooth System; rough shale hills, stony plains and broad drainage floors supporting hard spinifex grasslands and sparse shrubs; and
- The Urandy system; Stony plains, alluvial plains and drainage lines supporting shrubby soft spinifex grasslands.

4.1.3 Acid Sulfate Soils

A review of the Australian Soil Resources Inquiry System database indicated that the KBGP is located in an area of 'extremely low probability of occurrence' of ASS within the pipeline licence area.

4.1.4 Hydrology

The KBGP is situated within the Robe River surface water catchment of the Onslow Coast Basin in the north-west region. There is one major watercourse within the pipeline licence area, the Red Hill Creek (approx. KP 5.7), which is a non-perennial watercourse. There are also several minor un-named tributaries present. The closest perennial watercourse (the Ashburton River) is approximately 60 km to the south at its closest point to the pipeline licence area.

The Robe River Surface Water Area is situated over the KBGP. A Surface Water Area is proclaimed for the purposes of regulating the taking of water from watercourses and wetlands. As the Project will not be using surface waters it will have no impact on this area.

There are no Ramsar listed wetlands or Nationally Important (Directory) listed wetlands within, or in the vicinity of the KBGP.

The pipeline licence area primarily overlies the Hamersley – Fractured Rock aquifer, with northern sections intersecting the Upper Tertiary fluvial sediment aquifer. Formations as part of the Hamersley include an upper, middle and lower basement which predominantly recharge from surface water runoff and streamflow after significant rainfall events and flooding, especially around modern drainages (DoW, 2016). A hydrogeological assessment indicated groundwater quality is mostly fresh with TDS values below 1,000 mg/L, and pH values ranging from 7.8 to 8.2 indicating water quality is relatively neutral to slightly alkaline.

The closest Public Drinking Water Source Area (PDWSA) is the Bungaroo Creek Water Reserve located approximately 21.6 km north-east of the KBGP.

4.2 Biological Environment

4.2.1 Conservation Areas

The KBGP is not located within any conservation areas managed by DBCA.

4.2.2 Groundwater Dependent Vegetation

Vegetation surrounding Red Hill Creek is described as 'Moderate potential' to be terrestrial Groundwater Dependent Ecosystems. The KBGP itself, lies wholly in a low potential GDE.

4.2.3 Vegetation

4.2.3.1 Vegetation Communities

The pipeline licence area comprises mostly of native vegetation, which includes smaller patches of riparian vegetation surrounding Red Hill Creek and other non-perennial watercourses.

Using Beard (1976) and Shepherd et al. (2002), one broadscale vegetation system, comprising of thirteen vegetation communities, is present within the pipeline licence area. The Stuart Hills vegetation system is relatively well represented regionally, and it is estimated that 99.98% of its pre-European extent remains. Vegetation communities within the system are predominantly shrub-steppe, hummock grassland, and low woodland, typically dominated by *Triodia spp.*, *Acacia spp.*, *Grevillea spp.*, and *Eucalyptus spp.*

4.2.3.2 Conservation Significant Flora

A desktop study of previously conducted ecological surveys and the Atlas of Living Australia database (accessed 22 August 2022) with a 2.5 km buffer around the pipeline licence area returned records for four Priority Flora species. One additional conservation significant

species was identified during the 2021 flora and vegetation survey within the pipeline licence area, the Priority 3 species, *Indigofera rivularis*. No threatened species were recorded.

4.2.4 Weeds

Introduced weed species within the region, currently used for rangeland grazing, have been extensively described in the 2021 flora and vegetation survey report. The survey showed that there were ten weed species present in vicinity of the KBGP. None of these were declared as Weeds of National Significance or a declared pest plant.

4.2.5 Fauna

The protected matters search tool (DAWE, 2021) identified 17 species of native fauna of conservation or other significance (protected under the EPBC Act) that are likely to occur or have habitat likely to occur within the region.

4.2.6 Disease

Phytophthora Dieback is not an issue in the Pilbara region (CALM, 2004), as conditions are not favourable and there is a lack of susceptible vegetation required by *Phytophthora cinnamomi* along the pipeline route.

4.3 Social Environment

4.3.1 Native Title

The KBGP is entirely within the Kuruma Marthudunera (Part B) (WCD 2018/003) Determination area.

4.3.2 Heritage

4.3.2.1 Aboriginal Heritage

The Aboriginal Cultural Heritage Inquiry System (ACHIS) identified a single extant Aboriginal cultural heritage place RRK-KB-A-2201 (site ID 39712) of artefacts / scatter; grinding areas / grooves, within the pipeline licence area (approximately 110 m north of the pipeline at approx. KP 10.5).

4.3.2.2 European Heritage

No World Heritage Sites or Commonwealth Heritage Sites occur within 100 km of the KBGP (DCCEEW, 2022).

4.3.3 Socio-Economic

The KBGP is located in a region dominated by pastoralism with pockets of mining and petroleum activities. The primary land use associated with the pipeline licence area is rangelands, which support pastoral grazing on native vegetation

It is located within the Shire of Ashburton, with the town of Onslow (located approximately 107 km to the north-west) as the largest population centre in the vicinity of the KBGP.

The region is sparsely populated with limited settlement, transport and communications infrastructure. The region is relatively undeveloped, comprising a few homesteads.

5. Implementation Strategy

All works will be conducted in accordance with the APA Corporate Environment and Heritage Policy. It is the responsibility of the APA WA Manager Operations and Maintenance to ensure that APA Environment and Heritage policies and commitments are observed throughout all operational activities.

The APA Health, Safety, Environment and Heritage (HSEH) Management System is called 'Safeguard' (SG). SG provides a framework by which the processes relating to APA's HSEH activities are defined, implemented and controlled. Local business unit processes and procedures operating under SG management systems, provide further instruction to workers on performing activities.

SG is supported by a database, referred to as SG+. SG+ is used for functions such as incident reporting, auditing, action tracking and reporting.

The APA business tools and system used to manage and maintain all information relating to asset operations required for the implementation of management include:

- Maximo – Asset maintenance system (Work Order / Job Plan / Work Instruction)
- SG+ - Risk, actions, auditing and incident reporting system
- XIC – Landholder Contact Program, landholder information, access conditions, stakeholder consultation
- Learning Management System (LMS) – Training system used to capture APA staff information and learning materials
- SkillPASS – Contractor training, competency and accreditation system (under LMS)
- APA GIS/Field Map - Spatial system containing environmental and heritage data layers (government layers and data collected from APA surveys)

SG defines the requirements for environmental management under APA's Environmental Corporate Framework. Procedures, forms and other guidance materials for environmental management is available to all personnel via APA intranet Empower.

One Environmental Risk Assessment workshop was conducted to assess environmental risks associated with the operation of KBGP. The Environmental Risk Assessment is conducted in accordance with APA's 'Risk Management System – Group Procedure' which "aligns with the principles in the international risk standard ISO 31000:2018 - Risk Management". A summary of the primary environmental hazards, control measures and mitigating factors identified for the pipelines have been provided in Table 2.

Note: Table 2 is intended to be indicative of major hazards and controls only and is not comprehensive of all commitments made by APA in the OEMP.

Table 2: Primary Operations Environmental Hazards and Controls / Mitigating Factors

Summary of risks and impacts	Control Measures and Mitigation Factors
Overarching	<ul style="list-style-type: none"> • Regular legislation reviews • Toolbox talks • Works Environmental Assessment Process • Environmental audits • Site inspection • Inductions • Environment Procedures

Summary of risks and impacts	Control Measures and Mitigation Factors
<p>Aspect: Contamination</p> <p>Activity: handling, waste disposal</p> <p>Impact: Ground and water contamination</p>	<ul style="list-style-type: none"> • Site inspected for leaks/spill during periodic site inspections • Vehicle prestart • OSCP testing • Drip trays • Licenced controlled waste carrier engaged for all controlled waste transport on public roads • Spill kits • Reportable spills reported to relevant regulator verbally within 2 hours and via report within 3 days. • No refuelling on KBGP • Documented mobile plant pre-start checks completed before mobilisation • Regular documented LV pre-start checks completed • Capture in place to cover ground during coating • Spill kit inspections conducted in accordance with Maximo regime • Spill response equipment appropriate to the type and amount of chemical must be available at point of use or transport
<p>Aspect: Waste</p> <p>Activity: controlled, general, hydrocarbon, NORM waste storage, handling, transport and disposal</p> <p>Impact: Ground contamination, unauthorised discharge or community nuisance</p>	<ul style="list-style-type: none"> • Licenced controlled waste carrier engaged for all controlled waste transport on public roads. Tracking receipts retained for seven years. • Abrasive blasting activities not to occur within close proximity to watercourses without sufficient capture in place. • Spent garnet is wrapped up and disposed of in hydrocarbon bin for Class III landfill disposal • Piggings waste screened for radioactivity to determine waste stream • Identify/label as NORM contaminated waste • Arrange for APA approved (licensed) NORM waste contractor for management/ disposal • Designated temporary concrete wash-down bay set up to contain liquid waste where significant volumes of concreting and equipment wash-down is required • Concrete wash-down and waste shall be captured, tested and disposed of in accordance with Landfill Waste Classification and Waste Definitions 1996 • Concrete tanker utilised wherever possible to minimise mixing of concrete on site • Bags of dry concrete to be stored in a designated, dry undercover area • All waste to be removed from site and stored at MB
<p>Aspect: Heritage</p> <p>Activity: Driving, vegetation clearing, excavation</p> <p>Impact: unauthorised impact to heritage</p>	<ul style="list-style-type: none"> • Mulcher with GIS capabilities (geofencing or similar) or heritage boundaries flagged prior to clearing through heritage areas • Knowledge Holders contacted prior to any ground disturbing works inside heritage areas • Works Environmental Assessment Form completed prior to clearing or excavation • Spotter/guide engaged during LOS clearing • If heritage values or suspected human remains are unexpectedly discovered, or suspected to exist in the activity area, the activity must immediately cease in the vicinity (10m from extent) of the heritage discovery and be reported as per current APA HSE GP 07.01 Incident Reporting
<p>Aspect: Native Vegetation</p> <p>Activity: driving, vegetation clearing, excavation, weed spraying</p>	<ul style="list-style-type: none"> • Spotter/guide engaged during LOS clearing • Fire response equipment inspections in accordance with Maximo regime • Fire awareness to be reinforced during toolbox meeting • Works Environmental Assessment Form completed prior to clearing or excavation • Vehicles travelling on easement must have a fire extinguisher

Summary of risks and impacts	Control Measures and Mitigation Factors
<p>Aspect: PWD</p> <p>Activity: Driving, vegetation clearing, excavation</p> <p>Impact: Introduction of new and /or spread of PWD</p>	<ul style="list-style-type: none"> • APA vehicle washdowns bay maintained in good working order • All vehicle washdowns recorded in Washdown Register or similar • Vehicles and equipment kept clean and free of weeds and seeds • Clearing and excavation: equipment clean upon arrival
<p>Aspect: Fauna</p> <p>Activity: Driving, vegetation clearing, excavation</p> <p>Impact: Negative or unauthorised impact to biodiversity</p>	<ul style="list-style-type: none"> • Ramps for excavations left overnight • Fauna inspections undertaken in excavations and trenches that are left open overnight prior to work commencing • Works Environmental Assessment Form completed prior to clearing or excavation
<p>Aspect: Gas, Light and Dust</p> <p>Activity: controlled and uncontrolled gas release, rupture</p> <p>Impact: Contribution to global warming</p>	<ul style="list-style-type: none"> • NGER reporting in accordance with <i>National Greenhouse and Energy Reporting Act 2007</i> • NGI reporting in accordance with Environmental Protection (NEPM-NPI) Regulations 1998 • ERP is triggered for significant unplanned gas emission incidents • Site personnel are trained in the ERP
<p>Aspect: Noise, Vibration, Amenity</p> <p>Activity: facility operation</p> <p>Impact: Stakeholder nuisance</p>	<ul style="list-style-type: none"> • Fire response equipment inspections in accordance with Maximo regime • Fire awareness to be reinforced during toolbox meeting • Landowner notification prior to excavation and clearing • PTW for hot works in hazardous area • Vehicles travelling on easement must have a fire extinguisher
<p>Aspect: Soil and Watercourse</p> <p>Activity: Excavation, dewatering/dischage, vegetation clearing</p> <p>Impact: erosion, unauthorised dewatering, unauthorised impact to beds and banks</p>	<ul style="list-style-type: none"> • Topsoil must be stripped and stockpiled prior to, or at the commencement of, land disturbance activities • Vegetation/mulch to be respread following reinstatement • Easement patrols completed in accordance with maintenance regime (Maximo) • Erosion shall be rectified as soon as practicable • Dewatering conducted inline with DWER Water Quality Protection Note 13 • No disturbance to watercourse without Permit to Interfere with Beds and Banks • No discharge to watercourse permitted • Works Environmental Assessment Form completed prior to excavation and dewatering

6. Stakeholder Consultation

Stakeholders are identified by looking at the underlying land parcel and other layers of tenure or constraints intersecting each parcel. Stakeholder consultation is managed in the APA X-Info Connect (XIC) database, maintained by the Infrastructure Protection Team. X-Info stores all contact details, communications, land parcel details, APA access, risk level of each parcel, requirements for access and any documentation associated with the parcel. APA completes annual updates of the parcel information stored in X-Info. X-Info is used in conjunction with ARGO (Assets, Resources and GIS Online) to show the geometry for each parcel.

The main form of planned ongoing stakeholder consultation for APA pipelines is via the Third-Party Awareness Program (TPA) to achieve compliance with AS2885. Consultation is also done on an ad hoc basis for maintenance programs. Table 3 below shows the main forms of consultation that APA performs.

The following stakeholders have been identified as having an interest in KBGP operations:

- DEMIRS;
- DPLH;
- DWER;
- Department of Climate Change, Energy, the Environment and Water (DCCEE);
- Clean Energy Regulator;
- WARC;
- Robe River Kuruma Aboriginal Corporation (RRK) Local Knowledge Holders;
- Mineral Resources Limited (MRL);
- Shire of Ashburton;
- Red Hill Station.

6.1 Third Party Awareness Program

The TPA (APA-PR-QM-0006) is used to contact relevant industry, local government and utilities. The types of consultation for the TPA is in the form of meetings, emails, materials (i.e. toolbox, engagement letters, emails, calendar), multimedia (i.e. CodeSafe and e-learning), personal (i.e. meeting, face to face group presentations, conference or industry group presentation), and promotion (i.e. advertising, text message or email message, industry event, social media post). The TPA is used for providing these stakeholders with the location of the pipeline, safety and emergency requirements and APA contact if they propose to do any works in the vicinity of the pipelines. Response from recipients is not mandatory.

6.2 Routine Maintenance Works

Ad hoc consultation to notify landholders of routine works that will be carried out. APA endeavours to provide advanced notice of easement works to landholders and affected stakeholders. This is via letter or email. The notifications will outline the type, duration, date works are scheduled, APA's right of access and APA contact information. If the landholder has particular access requirements, they will also be reiterated on the notification.

Responses to these communications are not required by APA due to APA's right of access.

6.3 Third Party Works

Third party works are when an external party contacts APA as they have a project that will impact an APA pipeline. These can be activities that involve excavations, vertical and horizontal boring / drilling or installation of power lines. It may also be a connection into the APA pipeline. Third party works cannot proceed until APA has completed the necessary protection works.

The main communications to the impacted stakeholders will include description, date and duration of works. Government approvals may also be required for works, APA shall arrange approvals prior to works.

If responses are required by APA, this will be noted in the correspondence with an initial period of one month to reply. For individuals (freehold landowners), that don't reply, then APA will communicate again via the same method as well as others. If there is still no response, site visits will be made to attempt to make contact with the individual. The more time from the initial contact, the more frequent the ongoing contact is made.

For companies and government departments, when there is no reply, then alternative contacts will be used. If still no response, then the client may get involved until a determination is made. As above, the timing of the contact attempts shall become more frequent overtime.

There may be times where the client takes the lead for stakeholder consultation due to wider commitments, APA will still be a part of the process. These communications shall be recorded in X-Info.

6.4 Emergency Services

The APA emergency management team aims to consult with the district emergency management committee biennially, where possible. This is usually via a presentation at the committee meeting. The purpose of this consultation is to increase awareness of APA assets, emergency management plans and processes.

6.5 Emergency Works

Emergency works are completed when the emergency response plan is enacted.

For the consultation during an emergency, the impacted stakeholders are contacted, usually via phone with a follow up email, however APA doesn't always wait for a response. At the end of emergencies, there will be a closeout notification with the impacted parties.

Table 3: Consultation Programs

Program	Communication Methods / Materials	Frequency
TPA	Face to face meetings Letters Emails Phone calls Promotional materials Multimedia materials Presentations	Annual. The frequency of each group will be determined through the AS2885 safety management study, with high-risk groups contacted annually.
Routine Works	Letters Emails Phone calls	Ad hoc basis
Third Party Works	Face to face meetings	Ad hoc basis

Program	Communication Methods / Materials	Frequency
	Letters Emails Phone calls Risk assessments Permits / Approvals	
Emergency Consultation Services	Committee meeting Presentation Phone call Email	Biennially
Emergency works	Emails Phone calls	Ad hoc basis

Table 4 shows additional ad hoc consultation as part of ongoing stakeholder consultation outside of the abovementioned programs for the KBGP.

Table 4: Ongoing Stakeholder Consultation

Stakeholder	Detail	Method	Frequency
DEMIRS	Updates to OEMP Changes to activity Routine reporting Clearing referrals/permit applications	Email Telephone Meetings	As required
DWER	Permits/approvals/licences Controlled waste transport / contaminated sites		As required
DPLH	Heritage assessments		As required
DPIRD	Report declared weeds		As required
Clean Energy Regulator	NGER reporting		Annual
DCCEEW	NPI reporting		Annual
WARC	Licensing of APA facilities to temporarily store NORM waste		As required
MRL	Impact assessment for works		As required

7. APA Contact Details

For further queries regarding the KBGP Operations EP please contact the APA Environment Lead on (08) 6189 4300 or via the APA website at <https://www.apa.com.au/contact/>.

8. References

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