Health, Safety and Environment Management System

Environment Plan Summary



WGL.2373-RP-HSE-0002
WODGINA GAS LATERAL & WODGINA 2 GAS
PIPELINE ENVIRONMENT PLAN SUMMARY



Version Control and Authorisation					
Rev	Date	Status	Originated/ Custodian	Checked	Approved
А	03/12/2013	WGL: Issued for internal review and comment	B. Jayatilaka APA Environment Officer	-	S. Wareing APA, Team Leader Pt Hedland
0	12/12/2013	WGL: Issued for Use	B. Jayatilaka APA Environment Officer	-	S. Wareing APA, Team Leader Pt Hedland
А	20/01/2014	CPP: Issued for internal review and comment	B. Jayatilaka (Environment Officer)	-	E Mott (Field Services Manager - Pilbara)
0	22/01/2014	CPP: Issued for Use	B. Jayatilaka (Environment Officer)	-	E Mott (Field Services Manager - Pilbara)
1	22 May 2018	Five yearly update, new template and document number (formerly WGL- EMP-2969 and CPP-EMP-3010	M. Morel	B. Jayatilaka	A. Rawlinson
I			Environment Advisor	Environment Advisor	Environment Manager
		Updated with	M. Morel	B. Jayatilaka	A. Rawlinson
2	6 June 2018	DMIRS comments	Environment Advisor	Environment Advisor	Environment Manager
	13 December 2018	Updated to include commissioning and operation of Wodgina 2 Gas Pipeline.	Mgo	AAa	Jegen Frank
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1. Executive Summary

The Wodgina Gas Lateral (WGL) and Wodgina 2 Gas Pipeline (WGA) (referred to collectively as 'The Pipelines' in this Environment Plan [EP] Summary) and associated licences are presented in Table 1.

Table 1: Pipeline Licences

Licence	Pipeline	Licensee	Nominated Operator
PL 55, 56	Wodgina Gas Lateral (WGL)	Wodgina Lithium Pty Ltd	APT Goldfields Pty Ltd
PL 116	Wodgina 2 Gas Pipeline (WGA)	Wodgina Lithium Pty Ltd	APT Goldfields Pty Ltd

The Pipelines are owned by Wodgina Lithium Pty Ltd (WLPL), and operated by APT Goldfields Pty Ltd. The Pipelines begin with offtakes on the Pilbara Energy Pipeline (PEPL) at kilometre point (KP) 181.5 and 182.0 respectively, located approximately 40 km south west of Port Hedland. The Pipelines extend in a southeasterly direction for approximately 80 km to the Wodgina mine site. The facility area covered by this EP comprises The Pipeline's corridors, offtake and delivery stations, and cathodic protection infrastructure

Environmental aspects associated with the commissioning of the WGA and operation of both of The Pipelines have been risk assessed and specific measures identified to ensure that the potential environmental impacts are mitigated to as low as reasonably practicable (ALARP). The overall objective is to minimise impacts to the environment and social values as a result of operation and maintenance of The Pipeline.

Environmental aspects have been identified with reference to industry codes, standards and other guidelines. A summary of key environmental aspects identified for the activities under this EP includes, but is not limited to:

- Weed Management;
- Heritage Management (Registered and Other Heritage Sites);
- Groundwater Management (Yule River Water Reserve);
- Chemical and Hydrocarbon Management;
- Fauna Management (conservation significant species);
- Soil erosion; and
- Fire Management.

The Pipelines traverse land that is largely leased for pastoral use. The Pipelines do not intercept any nature reserves or Environmentally Sensitive Areas (ESAs), however The Pipelines pass close to Registered and Other Heritage places. The Pipelines also traverse the Yule River Water Reserve. Habitat for conservation significant fauna has been recorded during targeted surveys of The Pipelines and surrounding areas.



2. Introduction

This EP Summary provides an overview of the environmental management requirements for The Pipelines as set out in the EP.

2.1 Purpose and Scope

The purpose of this EP Summary is to provide information to the general public regarding environmental considerations relating to the commissioning of the WGA and operation of The Pipelines.

The scope of this EP Summary is limited to commissioning of the WGA and operation of The Pipelines.

2.2 Objectives

The overall environmental objectives of the EP are to:

- Minimise environmental impacts resulting from the commissioning of the WGA and operation of The Pipelines;
- Mitigate all identified environmental risks to a level that is As Low As Reasonably Practicable (ALARP);
- Comply with all relevant legal and regulatory environmental requirements; and
- Minimise disturbance to surrounding landholders.

2.3 Corporate Environmental Policy

APA is committed to responsible environmental management and believes that all environmental aspects associated with the commissioning of the WGA and operation of The Pipelines can be effectively managed. In addition, APA is committed to reducing all environmental risks subsequent to site based operational activities to ALARP.

All works will be conducted in accordance with the APA Corporate Health Safety and Environment (HSE) Policy.

All contractors and sub-contractors must comply with the EP. This requirement is specifically addressed within contractual arrangements. Regardless of this, APA takes full responsibility for the application and administration of the EP at all times.

2.4 Definitions

Table 2: Definitions

AHIS	Aboriginal Heritage Information System
ALARP	As Low as Reasonably Practicable
APA	APA Group
DAA	Department of Aboriginal Affairs
DBCA	Department of Biodiversity Conservation and Attractions
DG	Dangerous Good
DMIRS	Department of 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
EP	Environment Plan
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
MLV	Main Line Valve
OEP	Operations Environment Plan
OSCP	Oil Spill Contingency Plan
PDWA	Public Drinking Water Area
PL	Pipeline Licence
PTW	Permit to Work
SDS	Safety Data Sheet
SWMS	Safe Work Method Statement
TPC	Third Party Contractor
WGL	Wodgina Gas Lateral
WGA	Wodgina 2 Gas Pipeline
WQPN	Water Quality Protection Note



3. Facility Area and Activity Description

The WGL Is located within two pipeline licences (PLs):

- PL56: 75 km pipeline which extends from PEPL pipeline (Offtake Station, WGL KP0) to the Wodgina mine site boundary (WGL KP 75.1).
- PL55: 5 km lateral which extends from the Wodgina mine site boundary to Wodgina Power Station. WGL KP75.1 (Wodgina Mine Site Boundary) to Wodgina Delivery Station (KP80.2).

Approximate GIS coordinates (GDA 94 MGA Zone 50) for the operational area of the WGL are as follows:

- WGL commencement point: 633519.00 m E, 7725644.00 m N
- WGL termination point: 673958.39 m E, 7657731.18 m N

The WGA is located within PL 116 which extends from the PEPL (Offtake Station, WGA KP 0) to the WGA Delivery Station (KP 79.95).

Approximate GIS coordinates (GDA 94 MGA Zone 50) for the operational area of the WGA are as follows:

- WGA commencement point: 633446.00 m E, 7725579.00 m N
- WGA termination point: 637881.00 m E, 7657773.00 m N

The Pipelines run in parallel and traverse:

- The Yule River Water Reserve, managed by the Water Corporation (refer to Section 4.2.3 for further details);
- Crown land managed by the Department of Primary Industries and Regional Development (DPIRD);
- Pastoral leases: Mundabullanga, Kangan Stations and Indee Station;
- Road reserves managed by Main Roads or DPIRD, or local roads managed by the Town of Port Hedland and the Shire of East Pilbara; and
- Property with exploration and mining tenements and leases held by Wodgina Lithium Pty Ltd.

Minerals tenements granted under the Mining Act provide access to The Pipelines for maintenance and operation. Temporary work areas outside these tenements require landholder consent and appropriate regulatory approvals.



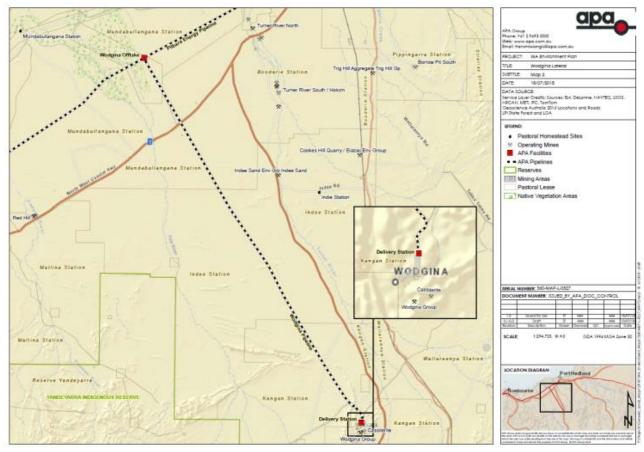


Figure 1: The Pipelines Locality Map

3.1 Pipeline Commissioning, Operations, and Maintenance

3.1.1 Commissioning of the WGA

The WGA will be commissioned according to a project-specific commissioning plan. Commissioning of the pipeline and associated facilities will commence at the WGA offtake and will be systematically tested and commissioned progressively downstream until the WGA metering station and delivery station have been commissioned and ready for operation. Commissioning works will include:

- Pre-commissioning Pre-testing all mechanical and electrical equipment and instrumentation at each facility;
- Commissioning Energisation of all components and/or gas is introduced for final verification of the operational and safety functions of the Pipeline and/or Facility, prior to handover of operational control. All gas blow throughs completed during the commissioning phase will be recorded and reported;
- Progressive introduction of gas, and commissioning each item of equipment sequentially until the whole system is capable of operating as a unit; and
- Handover to APA WA Pilbara Team, for management under the EP.

All routine commissioning activities will occur during 06:00 – 18:00; seven day work week, excluding any activity associated with emergency / critical situations.

3.1.2 Pipeline Operations and Maintenance

The Pipelines are operated by the APA Pilbara Region Team, operating from the Port Hedland Maintenance Base with support from the Karratha Maintenance Base. Specific operations and maintenance activities to which the EP applies include:

General equipment and facility maintenance;



- Filter changes;
- Cathodic protection surveys;
- Pipeline excavation;
- Line of sight vegetation maintenance;
- Venting;
- Pipeline pigging;
- Pipeline Patrols;
- Easement, facility and equipment inspections; and
- Breakdown and emergency response exercises.

Work activities carried out will be monitored and controlled as per the requirements of the Permit to Work (PTW) System. Further details are provided in the Gas Transmission Permit to Work Procedure (320-PR-HS-0005).

All routine maintenance activities will occur during normal working hours (06:00 – 18:00; Monday – Friday), excluding any activity associated with emergency / critical situations. Line of sight clearing and dig-ups may require weekend works (06:00 – 18:00).

3.1.3 General Equipment & Facility Maintenance

General equipment and facility maintenance typically includes but is not limited to the following:

- Servicing and overhauls of machinery and equipment;
- Equipment inspections and testing;
- Monitoring;
- Safety inspections and follow up;
- Filter inspections and replacement;
- General housekeeping (i.e. as per safety requirements and this EP); and
- Small-scale facility works.

The above activities involve various mechanical and electrical tasks which are undertaken by appropriately qualified tradespeople. Regular monitoring and safety inspections are also undertaken to identify unplanned maintenance requirements as they arise.

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

Small-scale upgrades may be required intermittently to allow for increased services or changes in pipeline requirements. Works will be restricted to the facility boundary.

General housekeeping includes numerous tasks typically associated with health, safety and / or environmental management. Specific items may include general tidying / cleaning, waste management, maintenance of firebreaks, spraying of weeds and numerous other duties.

3.1.4 Cathodic Protection Surveys

Cathodic protection (CP) refers to the use of electrical current to protect steel pipework against corrosion. Detailed CP surveys are undertaken annually to monitor pipeline integrity and ensure the CP system itself remains functional. Routine spot checks are conducted six monthly by accessing CP test points at approximately 5 km (WGL) and 2 km (WGA) intervals along The Pipelines and connection to a meter which measures corrosion. The CP is monitored continuously through the APA SCADA system.

3.1.5 Pipeline Excavation

Pipeline excavations are undertaken periodically typically for pipeline repairs and crossing installations. Pipeline excavations are strictly controlled for safety reasons via risk



assessment, work permits and procedures. The scale of excavations can vary from single defect dig-ups of a few metres.

Dewatering is sometimes required where the water table is present at less than a few metres from the ground surface, however this is rare and if required will be managed as per the EP.

3.1.6 Venting

Venting of gas from the pipelines is undertaken to purge pipelines and / or facilities for maintenance or emergency response purposes. Venting for maintenance purposes under normal operating pressure could typically release approximately 10 m3 of gas. Venting is managed through APA's maintenance management system (MAXIMO) in accordance with the site maintenance schedule. Due to the numerous types of filters it is only possible to estimate annual venting discharges. Quantities of vented gas are captured by APA and reported in the quarterly emissions and discharges report to DMIRS.

3.1.7 Pigging

Pipeline pigging is undertaken for the purposes of either pipeline cleaning or integrity assessment (intelligent pigging). Intelligent pigging is not achievable on the WGL due to pipeline diameter, however it will be carried out on the WGA.

For the WG, integrity is checked via a 10 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).

Cleaning pigging is conducted approximately every 10 years. Cleaning 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 ultimate 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 offsite disposal. Small amounts of general purpose grease and degreaser may be used during the pigging process which is managed as per the chemical requirements specified in the EP.

3.1.8 Right of Way (ROW) patrols

Pipeline ROW is sighted by the Pipeline Technicians monthly during metering data collection.

Formal vehicle patrols are completed by Pipeline Technicians on a six monthly basis with corridor condition inspection conducted annually. This work is conducted from light vehicles and managed through APA's maintenance management system MAXIMO with work orders being generated for completion. The vehicle patrols are completed in accordance with work instruction WI-L-20143. Any issues identified are documented and where necessary additional work orders raised for corrective action to be completed.

Patrols may identify issues such as:

- Third Party encroachments;
- Vegetation growth;
- Signage Line of Sight;
- Presence of weeds;
- Erosion, subsidence or stability issues;
- Exposed pipe; and
- Condition of signage and aerial markers.

Aerial patrols are completed monthly. The monthly aerial patrol is undertaken via a contractor and any issues / occurrences that are recorded during the flight are uploaded into X-Info directly by the contractor for APA to action. The contractors follow the Aerial Surveillance Procedure 320-PR-HEL-0001.



4. Receiving Environment

The Pipelines are located within the Pilbara region, as described within the Interim Biogeographic Regionalisation for Australia (IBRA). Mean annual rainfall varies between 250 mm and 350 mm with the majority during the summer months (Tille 2006). Weather is characterised by two distinct seasons; the "wet" season (summer) between November and April and the "dry" season (winter) between May and October. Cyclonic weather conditions and associated heavy rainfall occurs periodically during the summer months (BoM 2009).

The topography of the region is characterised by rocky, hilly terrain to the west and stony floodplains to the east. These observations are confirmed by Tille (2006) describing the area as hills and ranges with stony plains and some alluvial floodplains.

Groundwater in the Pilbara region predominantly occurs in palaeovalley calcrete unconfined aquifers. Some groundwater is located in fractured rock aquifers where groundwater is stored in the fractures, joints, bedding planes and cavities of the rock mass; often this water is hypersaline (Magee 2009). Depth to groundwater varies in relation to topographical influences and proximity to recharge areas, however in nearly all areas a buffer of more than 10 m exists between the surface and groundwater (ANRA 2009). Considerable surface water and groundwater interaction occurs in the Pilbara; rivers contribute significantly to groundwater recharge, particularly on coastal plains.

The pipelines do not traverse any Environmentally Sensitive Areas (ESAs), Ramsar wetlands or wetlands of national significance.

The flora and vegetation along the pipeline corridors have been surveyed and are generally considered common and widespread in the region. No vegetation was considered representative of "Threatened" or "Priority" ecological communities. No flora species listed as "Threatened" were identified, however one species listed as "Priority" was identified within and near the pipeline corridors. Two weed species were identified however they are widespread in the Pilbara and are not "Declared" under biosecurity legislation.

A number of fauna species of conservation significance are identified that may use the habitats along the pipeline corridors. In particular, evidence of Bilbies (listed as "Vulnerable") and Brush-tailed Mulgara (listed as "Priority") was recorded in surveys of the WGA corridor. The occasional and low-impact nature of the works under the EP is not considered to present substantial risks to such fauna; measures are however set out in the EP to further minimise such risks as far as reasonably practicable.



5. Heritage

Aboriginal groups identified as having an interest in the WGL include the Kariyarra People. Heritage surveys of the WGL easement were undertaken prior to construction of the pipelines. The pipeline alignments were selected to avoid areas of Aboriginal and European cultural significance identified during heritage surveys of the pipeline corridors.

The pipeline alignments were selected to avoid known sites of cultural significance protected under the Aboriginal Heritage Act 1972 and unregistered sites that were made known to Epic (the former operator before acquisition by APA) through the cultural survey process.

The DPLH register of Aboriginal sites and other heritage places for PL 55 and PL 56, and PL 116 (Appendix 7 and Appendix 8) identifies three sites along the pipeline routes:.

- Site ID 16034 (Karratha-South Hedland 17): The boundaries of this site were re-mapped with representatives of the Kariyarra People and archaeologists from the Yamatji Marlpa Aboriginal Corporation (YMAC). The re-mapping resulted in the boundaries of Site 16034 no longer overlapping the pipeline licence. YMAC will provide DPLH with the updated site recording forms (WLPL 2018).
- Site ID 9009 Gulindjina Yambara: WLPL has previously undertaken heritage surveys in this area with the Wamarranya representatives from within the Kariyarra People's native title determination application. The results of these surveys determined that site 9009 does not fall within the pipeline licence area (WLPL 2018).
- Site ID 37223 Women's Hill (Coodigulla) DPLH has undertaken a search of the pipeline in relation to this site and advised that the pipeline will not impact the site. YMAC confirmed that no further heritage surveys were required in this area (WLPL 2018).

Aboriginal ethnographic and archaeological surveys were carried out between May and June 2018, these surveys identified no other Aboriginal heritage sites that might be impacted by WGA construction; the pipeline route has been designed to avoid all known sites (WLPL 2018). No Section 18 approvals were required for construction of the WGA.

Consultation with the DPLH has established that pipeline activities such as access through a site (excluding ground disturbing works or alike) does not constitute impact to heritage sites and therefore is unlikely to breach Section 17 of the *Aboriginal Heritage Act 1972*.

This being the case, disruption to heritage areas and/or artefacts as a result of ongoing operational activities is not expected provided works do not extend beyond the previously disturbed easement boundary and vehicles remain within designated areas and access routes at all times. Should ground disturbing works be required, reference to the known DPLH AHIS database will be undertaken, and DPLH will be consulted as required. A cultural heritage management plan will be implemented if required.



6. Implementation Strategy

Implementation of the EP is via the APA Safeguard Environmental Management System and in compliance with the *Petroleum Pipelines* (*Environment*) Regulations 2012 requirements, including:

- communication of policies, objectives and roles and responsibilities;
- inductions, training and competency of personnel;
- monitoring, auditing, record keeping and reporting, including a dedicated hazard and incident reporting system;
- management of non-conformances and corrective actions;
- development, tracking and ongoing maintenance of documentation;
- emergency preparedness and response; and
- toolbox talks.

A risk based approach has been adopted to manage potential threats to the environment as a result of pipeline operation. This process involved initial identification of environmental interactions (aspects) resulting from operational activities followed by an ERA workshop attended by personnel from a range of qualifications. The ERA process involved:

- assessment of environmental risks in terms of likelihood and consequence;
- identification of mitigating factors and management measures to reduce environmental risks to ALARP; and
- · risk ranking according to severity.

A summary of the primary environmental hazards, control measures and mitigating factors identified for The Pipelines has been provided in Table 3.

It is important to note that Table 3 is intended to be indicative of major hazards and controls only and is not comprehensive of all commitments made by APA in the EP.

Table 3: Primary Commissioning and Operations Environmental Hazards and Controls / Mitigating Factors

Environmental Hazard	Control Measures and Mitigation Factors	
All hazards	HSE inductions communicating environment requirements	
	 Competent personnel – training and procedures / guidance materials provided 	
	Hazard and incident reporting via APA hazard and incident database	
	Management, PTW*, maintenance and emergency response systems in place	
	Regular audits, inspections and other EP compliance checks	
	TPC* compliance with EP commitments via contractual requirements	
	 JHAs* for tasks presenting specific environmental hazards 	
	Strict controls on vehicles and access implemented via Operations Manuals	
	Reporting as per Regulatory requirements	
	Compliance with all relevant legislation and regulatory requirements	
Air emissions	HAZOP* undertaken specifically addressing uncontrolled gas release	
	Assets designed as per standards of the day (failure prevention)	
	Physical protection (i.e. cordoning and signage) of live pipework	



Environmental	Control Measures and Mitigation Factors
Hazard	Control Measures and Mitigation Lactors
Chemical use	All
	Procedures for chemical use
	Chemical register and SDS* maintained for all hazardous substances onsite
	Storage & handling
	Storage of hazardous substances as per SDS and safety specifications
	Storage receptacle sizes and types defined and controlled
	Use of bunds and drip trays
	Capacity of bunds sufficient to contain quantity of largest stored container
	Minimise onsite chemical storage and use via off-site storage where possible
	<u>Transport</u>
	Use of licensed contractors for (large quantities) DG* Transport
	Strict access controls and maintenance of road condition
	Double skinned tank on diesel transport vehicles
	Spill prevention and response
	Spill response equipment available at site when chemicals in use
	ERP* and OSCP* to ensure adequate preparedness for spill response
	Regular checks and maintenance of machinery, plant and equipment
	Use of self bunded equipment where practicable
	<u>Chemical waste</u>
	Chemical waste treated as per other chemicals for management purposes
	Waste chemicals clearly marked and disposed of in accordance with regulations
Weed introduction and / or spread	Vegetation clearing and earthworks limited where possible (disturbed areas prone to weed proliferation)
	Strict hygiene measures for digging equipment and
	Access and vehicle controls imposed; as per existing roads and tracks
	Weed identification information available to personnel
	Timely response to declared weed occurrences as per DBCA*
	recommendations
Disturbance to local vegetation (both	Native vegetation clearing limited and in compliance with WA Environmental Protection (Native vegetation Clearing) Regulations 2004
native and other	Vegetative material from clearing retained for use during site remediation
desirable plants i.e.	Disturbed (by APA) areas to be remediated as follows:
feedstock)	Stockpiled topsoils re-spread evenly to a maximum depth of approximately 10 cm
	Surfaces reprofiled and scarified to assist seed and water trapping
	Stockpiled vegetative material spread over topsoils to aid vegetation
	re-establishment
Soil erosion	Strict controls on vehicles and access imposed
	Topsoil removal limited and controlled
	Topsoils removed for construction reused during post construction remediation
	Topsoil stockpiles maintained to minimise erosion
	Remediation of disturbed areas as described above



Environmental Hazard	Control Measures and Mitigation Factors
Ignition source for Fire	 Fire response equipment maintained at site and in vehicles and machinery Operations sites maintained to minimise fuel availability and fire risk Localised fire emergency response covered in ERP
	Emergency contact details available to all operations personnel Dedicated containers for chemicals classed as flammable Consider within design at all areas and the containers.
	Smoking within designated areas onlyFire awareness to be reinforced at toolbox meetings
Waste Generation (excluding	All wastes to be removed from site and disposed of to the appropriate class landfill facility
chemicals - see above)	Adequate waste receptacles maintained onsite and waste segregated as appropriate
Dust generation	Strict controls on vehicles and access
	Dust suppression assistance to be sought as required
Disturbance to local fauna and	Fauna movement not restricted – can move away from sources of disturbance
conservation	Excavation activities controlled
significant fauna	Escape ramps for fauna installed in open excavations and morning visual inspections undertaken
	Speed restrictions on easement and ROW
	Night driving only permissible with management approval
	Trained fauna handlers to be available for fauna removal and relocation
Third party	Regular landholder consultation undertaken
disturbance	Lighting at site to be concentrated in required areas only
	Strict controls on Operations vehicle movement imposed
Disturbance to heritage values	Works to cease and DPLH to be notified immediately if suspected heritage artefacts identified
	Strict controls on Operations vehicle movement imposed
	All site works contained within easement boundary

^{*}Definitions provided in Table 2



7. Stakeholder Consultation

A summary of stakeholders and consultation undertaken by APA is provided in Table 4.

Table 4: Stakeholder Consultation

Stakeholder Consultation to date		Ongoing commitment
Kariyarra People and their representatives	Liaison / advice prior to construction and ongoing throughout operations	Consultation as necessary as part of pipeline operations consultation program
Yandeearra Community	Liaison / advice prior to construction and ongoing throughout operations	Consultation as necessary as part of pipeline operations consultation program
LGA - Town of Port Hedland	Regular contact with the Shire via third party works process	Consultation as necessary as part of pipeline operations consultation program
Landholders	Liaison / advice prior to construction and ongoing throughout operations	 Notification of activities planned for sites Ongoing liaison throughout the course of the Operations.
Wodgina Lithium Pty Ltd	Ongoing commercial liaisonOperations consultation ongoingPipeline awareness	 Notification of activities planned for the easement within mine site Ongoing liaison throughout operations
DFES: Local emergency services provider	Liaison throughout ERP development and implementation	 Notification of risk activities as agreed (i.e. venting) Ongoing liaison throughout site operations
DMIRS: Regulator	Liaison / advice prior to construction and ongoing throughout operations	 Reporting monthly, 3 monthly, annually and at Operations close out General liaison as required i.e. due to Operations changes, audits etc.
DWER & DBCA: Regulator	Liaison / advice prior to construction and ongoing throughout operations	General liaison regarding vegetation, flora and fauna management as required
DPLH: Regulator	Liaison / advice prior to construction and ongoing throughout operations	DPLH to be contacted if heritage areas / artefacts encountered during Operations
DPRID: Regulator	Liaison / advice prior to construction and as required throughout operations	Consultation on land titles.
Water Corporation: Regulator	Liaison prior to construction and ongoing throughout operations regarding management of the Yule Water Reserve	 Ongoing liaison throughout operations Advice if excavating in the Reserve



8. APA Contact Details

For further queries regarding The Pipelines EP please contact the APA Environment Advisor on (08) 6189 4300 or via the APA website at Website https://www.apa.com.au/contact/.



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