

Explanatory Report Five-Yearly Review of the Statement of Environmental Objectives

QSN Link Pipeline, QSN Expansion Pipeline and Moomba Interconnect Pipeline

July 2026

Version Control and Authorisation

Version	Date	Status	Originated /Custodian	Checked	Checked	Approved
A	28/07/2026	For Public Consultation	David Geng, Senversa	Alice Skipper, Senversa.	Michelle Jennings, APA	

Distribution Record

Version No	Name / Location	Date
1.0	Draft for Public Consultation	23/07/2026

Revision History

Version No	SUMMARY OF AMENDMENT	Date
A	Draft for Public Consultation	23/07/2026

Table of Contents

1	Introduction.....	4
2	EIR Updates	4
2.1	Legislation and Guidelines.....	4
2.2	Description of the Environment	4
2.3	Environmental Impact Assessment	5
2.4	Environmental Elements.....	5
2.5	Environmental Risk Assessment	5
2.6	Control and Management Strategies	6
2.7	Environmental Significance Assessment.....	6
2.8	Implementation	6
2.9	Stakeholder Consultation	6
3	SEO Updates.....	7
4	Summary	7

1 Introduction

APA (SWQP) Pty Limited (ABN 67 066 656 219), a wholly owned subsidiary of the APA Group, holds the licence for, and operates the Queensland, South Australia and New South Wales (QSN) Link and the QSN Expansion Gas Pipeline, covered by Pipeline Licence (PL) PL18.

The QSN Link and QSN Expansion Pipeline transport natural gas between APA's Moomba Compressor Station in South Australia (SA) and the South West Queensland Pipeline (SWQP) Ballera Gas Facility in Queensland (Qld). Also included in PL18 is a section of the 650 mm nominal diameter Moomba Interconnect Pipeline (MIP), approximately 374 m long.

The APA Statement of Environmental Objectives (SEO) for the operation of PL18 was originally prepared and approved in 2020 under the *Petroleum and Geothermal Energy Act 2000* and *Petroleum and Geothermal Energy Regulations 2013*.

In 2024 the *Petroleum and Geothermal Energy Act 2000* and the *Petroleum and Geothermal Energy Regulations 2013* were superseded by the *Energy Resources Act 2000* (the ER Act) and the *Energy Resources Regulations 2013* (the ER Regulations). Regulation 13 requires the approved SEO to be reviewed every five years. APA has therefore undertaken this review.

The SEO and supporting Environmental Impact Report (EIR) have been updated in line with the ER Act and Regulations, and the Department for Energy and Mining's (DEM) *Environmental Impact Assessment (EIA) Criteria 2024* and *EIA Guidelines 2024*.

As a result, amendments such as the introduction of Leading Performance Criteria and more detailed Assessment Criteria have been updated to provide more clarity on what is or is not acceptable, and measure whether Environmental Objectives have been achieved.

This Explanatory Report summarises the amendments to the EIR and SEO.

2 EIR Updates

The key amendments made to the EIR in the 2026 version (compared to the 2020 version) are outlined below. As there were no changes to the Pipeline's operations during this period, the amendments relate more to legislative updates, more detailed descriptions of environmental impacts and the introduction of a new methodology to assess environmental significance (as set out in DEM's EIA Criteria and Guidelines).

2.1 Legislation and Guidelines

The legislative framework has been updated to reflect changes to the following:

- Amendment of references to the *Petroleum and Geothermal Energy Act 2000* and *Petroleum and Geothermal Energy Regulations 2013* with the *Energy Resources Act 2000* and *Energy Resources Regulations 2013*
- More detail added in relation to Environment Protection Policies (EPPs) under *Environment Protection Act* policies including the Air Quality, National Pollutant Inventory, Water Quality, Commercial and Industrial Noise and Waste to Resources Policies
- Updates to the description of the *Aboriginal Heritage Act 1988* to take into account amendments under that Act and referencing the associated *Attorney-General's Department, A guide to Aboriginal Heritage in South Australia (January 2025)*.
- Updates to the *Landscape South Australia Act* and references to the SA Arid Lands Landscape Board.

2.2 Description of the Environment

Updated online database searches were undertaken as part of the five-yearly review including:

- Biological Database of South Australia and SA Nature Maps
- *Environment Protection and Biodiversity Conservation Act 1999* (EPBC) Protected Matters Search Tool
- Register of Aboriginal Sites and Objects
- List of key Stakeholders and Landowners

Minor amendments were made throughout the 'Description of the Environment' section of the EIR to reflect these updated database searches and improve the accuracy of the environmental context in which the Pipeline operates.

2.3 Environmental Impact Assessment

A comprehensive Environmental Impact Assessment (EIA) was undertaken in line with Part 12 of the ER Act and with DEM's EIA Criteria and Guidelines 2024. Section 5 of the EIR outlines the 6-Step Methodology which included:

- **Step 1: Identify environmental elements** that could be impacted by the proposed regulated activity (which aligns to Criteria 1 – Elements of the Environment (addressed in Section 3 and Section 6 of this EIR).
- **Step 2: Identify potential impact events** that could impact elements of the environment during operations and maintenance of the pipeline (which aligns to Criteria 2 – Potential Impact Events (Section 7).
- **Step 3: Confirm the potential of impact events to occur** (which aligns to Criteria 3 – Confirmation of Impact Events (Section 7).
- **Step 4: Identify relevant controls and management measures** for each potential impact event to eliminate or reduce any potential environmental harm to as low as reasonably practicable, and **identify uncertainties and assumptions** associated with the effectiveness of controls and management measures (which aligns to Criteria 4 – Control and Management Strategies and Uncertainty Assessment (Section 8).
- **Step 5: Assess environmental significance** for each potential impact event, based on the sensitivity of the receiving environment and the magnitude of potential impacts, and taking into account frequency, duration, extent and severity of impacts as well as potential cumulative impacts (which aligns to Criteria 5 – Environmental Significance Assessment (Section 9).
- **Step 6: Develop environmental objectives and assessment criteria** for all potential impacts for each environmental element (which aligns with Criteria 6 – Statement of Environmental Objectives (addressed in Section 8 and in a standalone SEO document).

Results of the impact assessment are captured in Section 7 (Environmental Risk Assessment – **Table 20**) and Section 8 (Controls and Management Strategies) with any residual impacts captured in Section 9 (Environmental Significance Assessment - **Table 32**).

The impact assessment was carried out in accordance with ISO 31000 Risk Management Guidelines and the APA HSE ENV – Guideline 001 Environmental Risk Assessment Guideline.

2.4 Environmental Elements

This Section and Section 4 provide a description of the specific elements of the environment that can reasonably be expected to be affected by the activities, with particular reference to the environment and existing land uses.

Under the EIA Criteria, APA is required to provide (for each environmental element) a summary of any relevant issues or considerations raised by stakeholders, and any relevant legislated or recognised standards in relation to the element of the environment, identify potential receptors, and undertake an impact assessment of how the element could be potentially impacted by the activity.

Consultation with external stakeholders was undertaken between 22 September 2025 and 7 November 2025 with the parties and all their responses listed in Appendix 3 – Stakeholder Consultation. Where relevant, the EIR was updated to take responses into account.

Table 18 outlines each relevant environmental element, the views of affected parties, and relevant legislation and standards applicable to each element.

2.5 Environmental Risk Assessment

Table 20 outlines the Environmental Risk Assessment (ERA) that was undertaken as part of the five-yearly review. The ERA below addresses Potential Impact Events and Confirmation of Impact Events.

APA's Enterprise Risk Matrix was applied to each impact to determine an inherent risk rating (i.e. the risk without

any controls in place) and a residual risk rating (the risk with control measures applied).

2.6 Control and Management Strategies

Environmental aspects associated with the operation and maintenance of the pipeline and their risks were identified during the ERA process, and an overview of the potential environmental risks, impacts and management methods employed to address those risks is outlined in the Control and Management Strategies section. Residual likelihood, consequence and risk ratings have been provided.

The key change to this section is, in accordance with the ER Act, ER Regulations and EIA Criteria and Guidelines, “Assessment Criteria” and “Leading Performance Criteria” have been detailed to outline the criteria used by APA to inform the effectiveness of their management measures.

Enhancements to this section include:

- Separating Water (surface and groundwater) and Soil as environmental aspects so that more targeted objectives, assessment criteria and leading performance criteria can be developed
- More detailed references to the *Environment Protection Act*, EPPs, Waste Tracking requirements, and National Environment Protection (Assessment of Site Contamination) Measure (ASC NEPM) 1999, as recommended by the EPA
- More detailed information in relation to the management of Aboriginal and non-Aboriginal heritage, and the engagement that APA undertakes with Traditional Owners, and ensuring the assessment criteria and leading performance criteria are clear on when the Unexpected Finds protocol needs to be implemented (following feedback from the Attorney General's Department, Aboriginal Affairs and Reconciliation)
- More detail in relation to water affecting activities and associated permits required, and including a new assessment criteria relating to additional surveying of land following heavy rainfall
- Better description of water courses, flood plains, drainage lines and changes to flow patterns, and the potential for erosion, following feedback from the SA Arid Lands Landscape Board.

2.7 Environmental Significance Assessment

This Section addresses the significance of the residual environmental impact, taking into account the application of the controls and management measures set out in Section 8, and addresses Criteria 5 – Environmental Significance Assessment of the Environmental Impact Assessment Criteria.

2.8 Implementation

Minor changes to this section were made to ensure better descriptions of APA's Environmental Management System, and the tools it uses to manage risk. More detail was also added to the Audits and Inspections section to ensure that APA's robust inspection and monitoring program is documented and linked to each Environmental Element.

2.9 Stakeholder Consultation

Section 11 of the EIR outlines the Stakeholder Consultation that APA undertook with key stakeholders including:

- Department for Energy and Mining (DEM);
- Department for Environment and Water (DEW);
- Environment Protection Authority (EPA);
- Department for Infrastructure and Transport (DIT);
- SA Arid Lands Landscape Board;

- Department of Primary Industries and Regions (PIRSA); and
- Landholders.

A summary of the consultation is included in Appendix 3, including all responses received, APA's response and where in the EIR the amendments have been made.

3 SEO Updates

This section outlines the key changes made to the SEO as part of the five-year review, based on a comparison between the 2020 and 2026 version.

Based on feedback from DEM, the key changes include:

- Addition of a specific wording to refer to "ground and surface water" in the objectives (whereas previously this objective only addressed "water resources")
- Better definition of all objectives to remove words such as "avoid" or "minimise"
- Reducing the number of overall objectives by combining "public health and safety" and "landowner" objectives to avoid duplication
- Combining "wastewater" objective with broader "waste and contamination" objective to avoid duplication
- Updating Section 5 to include a more up-to-date description of "incident definitions" for both Serious and Reportable Incidents
- Updating Appendix 1 to include not only the Objectives, a Guide to Achieving the Objectives and Assessment Criteria, but also new Leading Performance Criteria, aimed at making each objective more specific and measurable.

4 Summary

Whilst amendments have been made to the EIR and SEO, the Pipeline's operations and footprint have not changed since the 2020 versions of the EIR and SEO. As a result, these changes have been made so that the environmental impacts can be better understood and defined, appropriate controls are put in place and objectives can be measured and met.