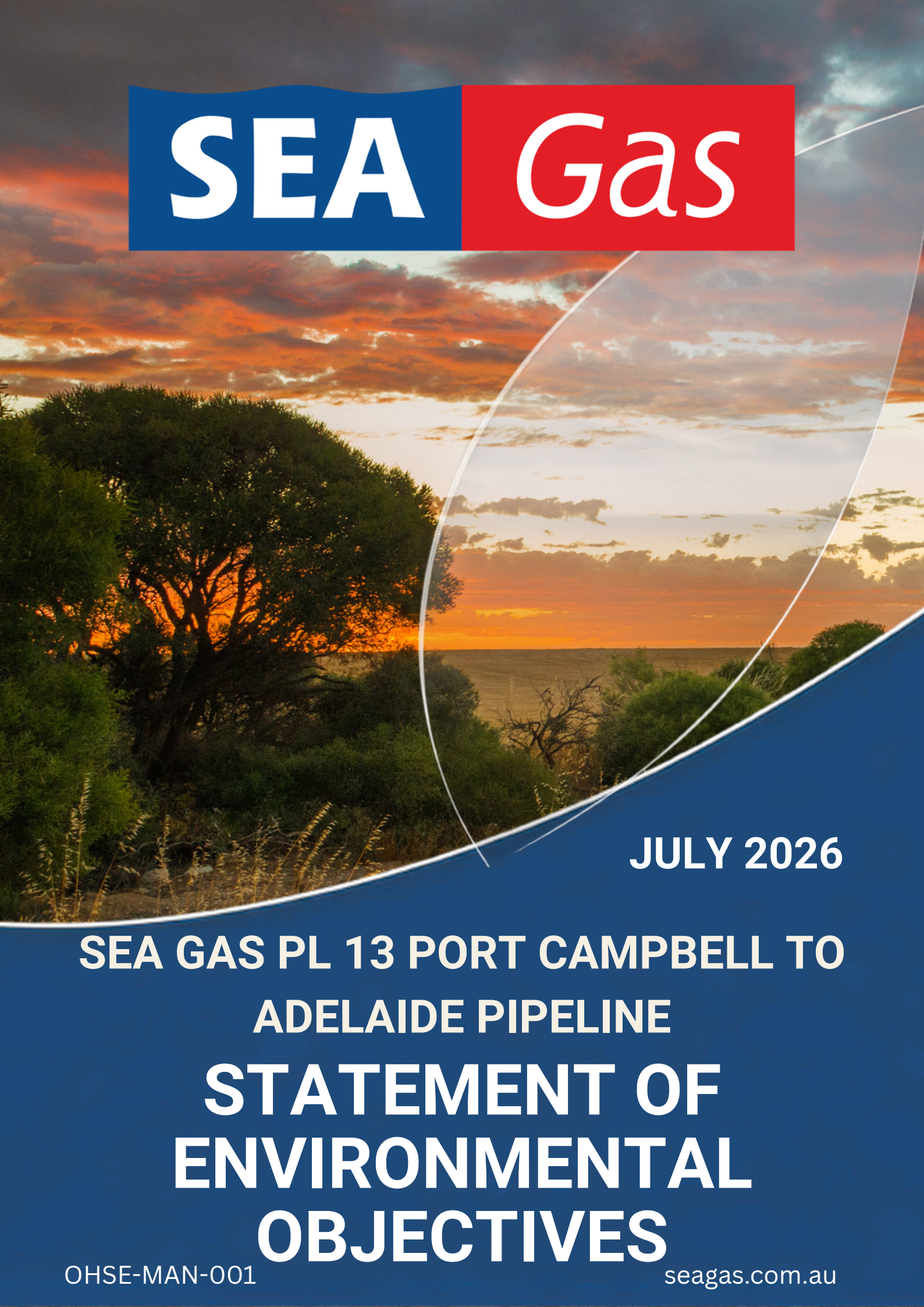




SEA

Gas

JULY 2026

**SEA GAS PL 13 PORT CAMPBELL TO
ADELAIDE PIPELINE
STATEMENT OF
ENVIRONMENTAL
OBJECTIVES**

OHSE-MAN-001

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	SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	Doc Ref: OHSE-MAN-001
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SEA Gas PL 13 Port Campbell to Adelaide pipeline

Statement of Environmental Objectives, 2026

SEA Gas					
Document Ref:	OHSE-MAN-001				
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	SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	Doc Ref: OHSE-MAN-001
This is a Controlled Document	Review Date: July 2031	

Distribution Register		
Name	Position Title	Company
Library	-	SEA Gas
Library	-	APA Group
Michael Malavazos	Director Engineering Operations	Energy Resources Division, Department for Energy and Mining

Modification Register		
Date	Revision	Details of Change
15/01/2014	5	Update of incident definitions in the following sections: 8.2: Serious Incidents Table 1: Serious Incident Definitions for Operation (Facility and Pipelines) Activities. 8.3: Reportable Incidents Table 2: Reportable Incident Definitions for Operation (Facility and Pipelines) Activities.
3/7/2015	6	5 year review of SEO General update and minor changes to clarify objectives
10/9/2015	7	Sections 2 and 4 revised to address DEM comments
12/2/2016	8	To address government consultation minor updates made to Section 2.2, 2.4, 3.3, 3.4, 6 and 13.4 and Section 3 has been added.
23/12/2020	9	5 year review of SEO, minor updates to reflect: - Changes in legislation, standards, EPA policies and SEA Gas procedures - Completion of all construction rehabilitation work - Operational experience
22/3/2021	10	Minor amendments to address comments from DEM.
13/07/2021	11	Amendments to address outcomes from Government consultation.
April 2026	12	Five Year Review and amendment to conform to revised requirements of the <i>Energy Resources Act 2000</i> and <i>Energy Resources Regulations 2013</i> .
May 2026	12a	Incorporating feedback from DEM arising from Consultation Plan notification.
July 2026	12b	Incorporating feedback from consultation process detailed in consultation plan meeting the requirements of Regulation 11.
Aug 2026	12c	Document title changes to facilitate public consultation process, as requested by DEM

	SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	Doc Ref: OHSE-MAN-001
This is a Controlled Document	Review Date: July 2031	

TABLE OF CONTENTS

1	INTRODUCTION	5
1.1	Purpose	5
1.2	Scope.....	5
1.3	Description of the Pipeline System.....	5
2	ENVIRONMENTAL ELEMENTS, OBJECTIVES AND ASSESSMENT CRITERIA.....	7
2.1	Environmental Elements.....	7
2.2	Objectives	7
2.3	Assessment Criteria.....	8
2.4	Leading Performance Criteria.....	8
3	ENVIRONMENTAL OBJECTIVES, ASSESSMENT CRITERIA AND LEADING PERFORMANCE INDICATORS.....	9
3.1	Soils and Terrain.....	9
3.2	Water resources (surface and groundwater)	13
3.3	Flora and fauna	16
3.4	Cultural and historical heritage (aboriginal and non-aboriginal).....	20
3.5	Noise & vibration	22
3.6	Air Quality & GHG	24
3.7	Public health and safety	26
3.8	Security of gas supply	29
3.9	Waste management	31
3.10	Hazardous Storage, Spill and Emergency response	34
3.11	Weeds, pests and pathogens	36
3.12	Third party infrastructure, landholders and land use (including visual amenity and socio economic)	38

	SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	Doc Ref: OHSE-MAN-001
This is a Controlled Document		Review Date: July 2031

4	MEASUREMENT AND EVALUATION.....	42
4.1	Environmental Monitoring	42
4.2	Environmental Audits.....	42
4.2.1	Internal Audits.....	42
4.2.2	External Audits.....	42
5	REPORTING	43
5.1	Incident Reporting.....	43
5.1.1	Immediately Reportable Incidents.....	43
5.1.2	Reportable Incidents.....	44
5.1.3	Other Reporting Requirements	46
6	DEFINITIONS	47
7	GLOSSARY	49
8	REFERENCES	50

	SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	Doc Ref: OHSE-MAN-001
This is a Controlled Document	Review Date: July 2031	

1 **Introduction**

1.1 **Purpose**

This Statement of Environmental Objectives (SEO) outlines the environmental objectives that South East Australia Gas Pty Ltd (SEA Gas) is required to achieve and the criteria upon which the objectives are to be assessed in relation to the construction, commissioning, operations, maintenance and decommissioning of the SEA Gas Pipeline System, pipeline licence PL 13 (South Australia). The SEO has been developed on the basis of information provided in the SEA Gas Pipeline South Australian Environmental Impact Report 2026 (EIR).

This SEO has been prepared to meet the requirements of *Part 12* of the *South Australian Energy Resources Act 2000* and *Part 3* of the *South Australian Energy Resources Regulations 2013*.

The SEO has been reviewed in 2026 in parallel with a revision to the EIR in accordance with the requirements of *Part 3 of the Energy Resources Regulations (SA) 2013*.

1.2 **Scope**

This document relates to the South Australian section of the SEA Gas pipeline system and applies to:

- All activities associated with operation and maintenance of the pipeline system;
- Construction activities such as small laterals, relocation and extensions, and above ground facilities (subject to an environmental assessment being undertaken to confirm that the SEA Gas pipeline SEO is adequate for the new installation);
- Future construction of the Yallamurray compressor station; and
- Decommissioning of the SEA Gas pipeline system or sections of the SEA Gas Pipeline system and associated laterals.

1.3 **Description of the Pipeline System**

The SEA Gas pipeline system consists of high pressure natural gas pipelines, laterals and associated facilities, which extend from Iona in Victoria to Adelaide in South Australia. The pipeline system's primary function is to provide safe and reliable transportation of high pressure natural gas from receipt points to delivery points.

The main pipeline, the Port Campbell to Adelaide pipeline (PCA) commences at the Otway Gas Plant and the Underground Gas Storage Plant at Iona, near Port Campbell, connects with the Port Campbell to Iona pipeline (PCI) and the Athena Gas Plant at the Langley crossover and continues in a generally north-westerly direction to Adelaide, terminating at Pelican Point.

Figure 1-1 shows the location of the pipeline system in South Australia. The pipeline alignment crosses the South Australian – Victorian border south-east of Naracoorte in South Australia, then travels directly north-west toward Murray Bridge, passing north of Naracoorte. The pipeline crosses the Murray River near Jervois, approximately 25 km south-east of Murray Bridge, traverses the western fringe of Murray Bridge and continues north-westerly to the north of Mount Pleasant in the northern Mount Lofty Ranges. The alignment continues north-west through the Williamstown and South Gawler areas, before turning south-west and travelling across the northern Adelaide Plains towards Bolivar and Dry Creek. The pipeline follows the Port

Revision: 12c	Page 5 of 50
OHSE-MAN-001 SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	

	SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	Doc Ref: OHSE-MAN-001 Review Date: July 2031
This is a Controlled Document		

River Expressway to Gillman where it crosses the North Arm of the Port River onto Torrens Island. The pipeline crosses the Port River from Torrens Island to terminate at Pelican Point.

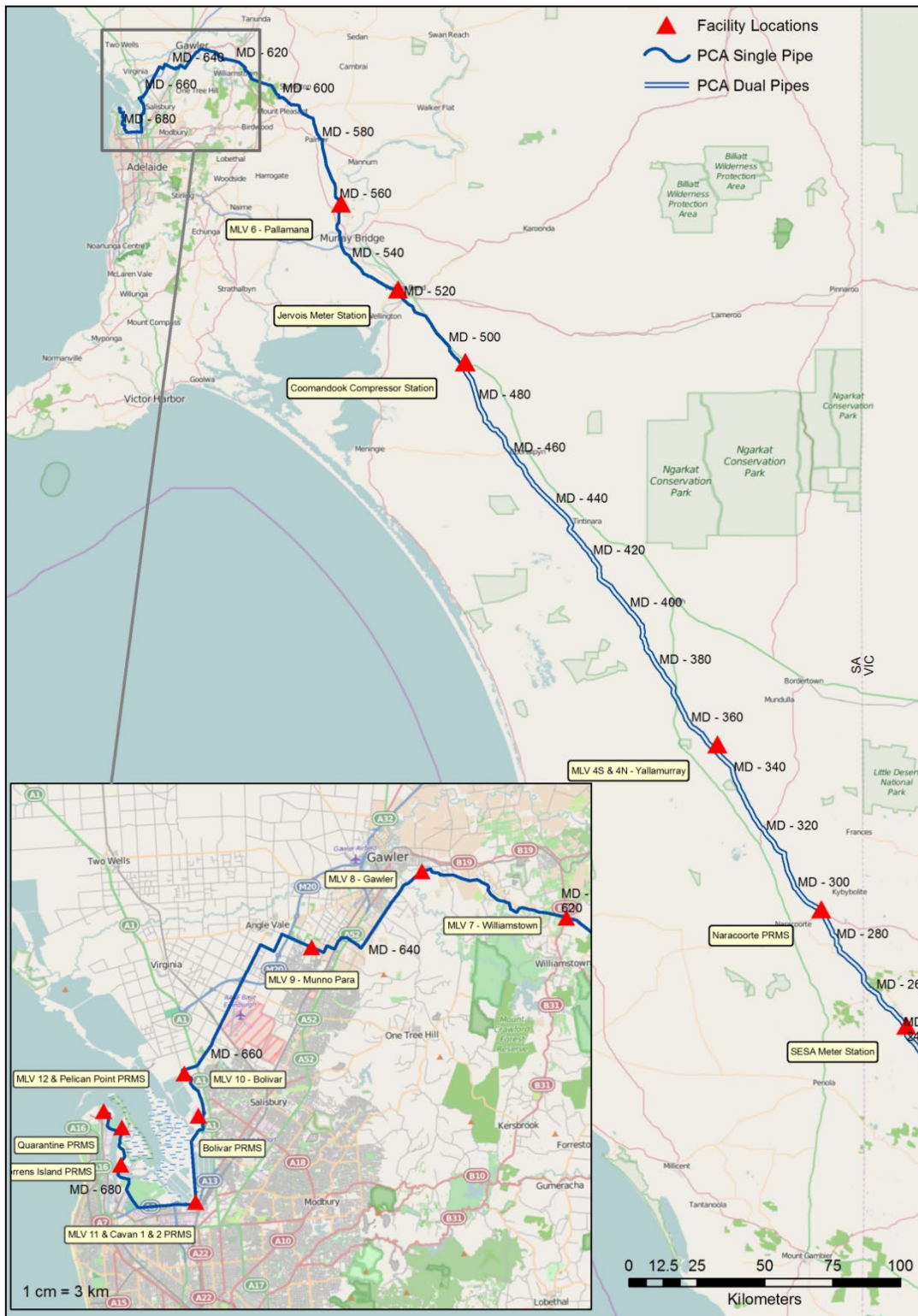


Figure 1-1: SEA Gas pipeline system route through South Australia

Revision: 12c	Page 6 of 50
OHSE-MAN-001 SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	

	SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	Doc Ref: OHSE-MAN-001
This is a Controlled Document	Review Date: July 2031	

2 **Environmental Elements, Objectives and Assessment Criteria**

Section 12 (3) of the *Energy Resources Regulations 2013* requires an SEO to include:

- Objectives that relate to dealing with the impacts on various elements of the environment associated with carrying out the relevant regulated activity; and
- Criteria to be applied to determine whether or not the stated environmental objective has been achieved in a particular case.

Objectives and assessment criteria are required for each impact event identified in the EIR.

2.1 ***Environmental Elements***

The following environmental elements are addressed within the context of the objectives:

- Soils and terrain;
- Water resources (surface and ground water);
- Flora and fauna;
- Cultural and historical heritage (Aboriginal and non-Aboriginal);
- Noise & vibration;
- Air quality & GHG
- Public health and safety;
- Security of gas supply;
- Waste management;
- Hazardous storage, spill and emergency response;
- Weeds, pests and pathogens;
- Third party infrastructure, landholders and land use (including visual amenity and socio economic);

2.2 ***Objectives***

The principal environmental management objectives for the SEA Gas pipeline include implementing management measures to avoid, minimise or mitigate significant environmental impacts, by:

- Ensuring that adverse effects on the environment are appropriately managed to minimise environmental harm;
- Eliminating as far as reasonably practicable the risk of significant long term environmental harm; and
- Ensuring that land adversely affected is appropriately rehabilitated.

Objectives detailed within this SEO are based on the management of environmental elements and impacts identified in the EIR, as well as risks and hazards that have been identified during pipeline operations.

Objectives are aimed at ensuring continued compliance with industry best practice in relation to the management of the physical, biological, social and cultural elements of the environment. SEA Gas is committed to responsible environmental management during operational, maintenance, construction and decommissioning activities, ensuring that potentially adverse

Revision: 12c	Page 7 of 50
OHSE-MAN-001 SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	

	SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	Doc Ref: OHSE-MAN-001
This is a Controlled Document	Review Date: July 2031	

environmental elements and impacts are identified and risks are appropriately managed. SEA Gas is committed to achieving all stated environmental compliance objectives.

Sections 3 of this document detail the management objectives and assessment criteria, in order to validate compliance.

2.3 **Assessment Criteria**

Environmental objectives are subject to an assessment to measure the level of achievement. Section 12 (4) of the *Energy Resources Regulations 2013* sets out the criteria for assessment required to be incorporated in the SEO:

- Description of the objective to be measured and the manner and form of the measurement to be used;
- Locations where the relevant measurements are to be taken, or how such locations are to be determined;
- Frequency of any measurement or monitoring;
- Any background or control data that is to be used or the manner in which such data is to be obtained;
- How the achievement of a relevant objective is to be determined (with consideration being given to any inherent errors of measurement);
- If required by the Minister - provisions with respect to assessing the ongoing fitness for purpose of management systems, facilities, plant, equipment, machinery or other infrastructure to ensure:
 - security of production or supply of natural gas; and
 - the protection of public safety; and
 - the protection of the environment; and

The criteria may include provisions with respect to:

- Gathering information and the conduct and timing of studies; and
- The conduct and timing of management system audits; and
- Must, so far as is reasonably practicable and appropriate, be expressed in quantitative (rather than qualitative) terms.

The assessment criteria for each objective are set out in Sections 3 of this document.

2.4 **Leading Performance Criteria**

Section 100 (1) (d) of the *Energy Resources Act 2000* requires that an SEO set out leading performance criteria.

Leading performance criteria have been provided for each impact event that relies significantly on a control strategy to reduce the potential environment impact identified in the EIR. These criteria are intended to give early warning that a control measure may fail or is failing, and that the environmental objective or relevant assessment criteria is at risk of not being achieved, allowing time to respond accordingly.

The leading performance criteria for each objective are set in Section 3 of this document.

Revision: 12c	Page 8 of 50
OHSE-MAN-001 SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	

3 Environmental Objectives, Assessment Criteria and Leading Performance Indicators

3.1 Soils and Terrain

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
Objective 1: To avoid or minimise adverse impacts on soils and terrain (Construction and Commissioning)			
1.1 To minimise soil erosion and sedimentation as a result of construction activities.	- Records of audits/inspections show that erosion along the ROW is consistent with the surrounding environment.¹ - Records of audits/ inspections show no significant uncontrolled soil erosion as a result of pipeline construction activities.¹ - Records of audits/ inspections show land contour and watercourse banks reinstated to pre-construction conditions.¹	- Soil management (e.g. – prevention of mass soil movement, protection of soils from contamination, avoidance of significant geological features, adequate compaction to avoid trench subsidence) and ROW reinstatement. - Temporary silt fencing, filtration and sediment control measures implemented and monitored in susceptible areas along the ROW. - Construction workforce trained in relation to SEO and CSEMP requirements. - Where required, compliance auditing of ROW (i.e. – assessment of erosion susceptibility and effectiveness of engineering controls). - Minimising time between clear and grade and subsequent restoration in areas susceptible to erosion. - Avoidance of areas prone to land slippage. - Minimising ground disturbance and vegetation clearing necessary for safe pipeline construction. - Where practicable, construction to be scheduled during the drier time of year to minimise potential for erosion of exposed soils. - Any necessary pipeline trench or groundwater dewatering (or hydrotest water discharge) is undertaken in a manner that does not cause erosion of nearby areas or sediment loss.	ST01
1.2 To prevent soil inversion	Records of audits/inspections show no evidence of subsoil on surface (validation may include colour, texture, ribbon length, pH and ‘carbonate fizz’ testing or chemical analysis). ¹	- Adherence to administrative protocols in SEA Gas Pipeline Excavation procedure (TECH-PR-013) and Environmental Reinstatement Procedure (OHSE-PR-013). - Induction of construction workforce in relation to SEO and CSEMP compliance expectations. - Where required, photo point monitoring to validate compliance.	ST01
1.3 To mitigate soil compaction, if	Records of audits/inspections demonstrate no visual evidence of	Ripping of identified compacted areas.	ST01

¹ Audit/Inspection frequency is as determined and documented in the CSEMP

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
necessary, by remediation	soil compaction (e.g. hard soil, local water pooling and failure of revegetation to successfully establish) following ROW remediation. ¹	- Where required, compliance auditing of ROW. - Restricting all vehicles and equipment movements to the ROW or designated access tracks and roads.	
1.4 To identify and avoid acid sulphate soils and to have in place strategies for managing exposure	Records of audits/inspections demonstrate no evidence of likely acid sulphate soil exposure (e.g., odour, discoloration, vegetation loss). ¹	- Identification prior to construction of areas which may potentially have acid sulphate soils. - Adherence to excavation procedures and CSEMP in relation to acid sulphate soil management. - Inadvertently exposed acid sulphate soils encountered during construction are effectively treated.	ST01
1.5 To identify and manage pre-existing site contamination.	Records of audits/inspections demonstrate no HSE incidents in relation to pre-existing site contamination. ¹	Administrative controls in place (refer Incident & Hazard Management Procedure (OHSE-PR-004)) to manage identified site contamination.	ST01
1.6 To reinstate soil and/or terrain as near as practicable to pre-construction contours, profiles or conditions	Records of audits/ inspections show that surface contours along the ROW are consistent with adjoining land.	- ROW reinstatement in accordance with CSEMP and in consultation with landholders. - Induction of construction workforce in relation to SEO and CSEMP compliance expectations. - Where required, compliance auditing of ROW. - Where required, photo point monitoring to validate compliance.	ST01
Objective 2: To maintain soil stability along the easement (Operations, maintenance and decommissioning)			
2.1 To remediate erosion or subsidence as a consequence of pipeline operations in a timely manner.	- Records of audits/ inspections demonstrate no un-remediated soil erosion or subsidence along the pipeline easement. ² - Records of audits/ inspections show that pipeline operations do	- Scheduled ground and aerial patrols of the easement and additional patrols following significant weather events. - Stakeholder consultation program to validate compliance. - Periodic Inspection of Critical Watercourse Crossings listed in the Critical Watercourse Inspection Register (OHSE-R-001) and additional inspections following significant weather events. ³ - Where required, photo point monitoring to validate compliance.	ST02

² Aerial and ground patrols are undertaken on a daily, weekly, fortnightly, monthly and 3 monthly basis as defined in the Pipeline Integrity Management Plan. Landholders and key stakeholders are consulted on a 1 to 5 yearly basis as defined in the Pipeline Integrity Management Plan.

³ Critical watercourse inspections are undertaken on a monthly (aerial patrols) to annually basis as defined in the Pipeline Integrity Management Plan.

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
	not enhance soil erosion on the easement. ²		
2.2 To prevent soil inversion	- Records of audits/ inspections show that vegetative cover is consistent with surrounding land. ² - Records of audits/ inspections demonstrate no evidence of subsoil on surface (validation may include colour, texture, ribbon length, pH and ‘carbonate fizz’ testing or chemical analysis). ²	- Induction of operations personnel and contractors in relation to SEO compliance expectations. - Excavation activities carried out in accordance with Pipeline Excavation Procedure (TECH-PR-013) in order to adequately separate stockpiled topsoil away from sub-surface fill during excavation. - Reinstatement in accordance with Environmental Reinstatement Procedure (OHSE-PR-013) to ensure appropriate placement of topsoil. - Monitoring of the re-establishment of vegetation (Note: unsuccessful re-establishment of vegetation may indicate soil inversion). - Where required. easement auditing and photo point monitoring to validate compliance.	ST02
2.3 To effectively manage impacts of acid sulphate soil exposure	Records of audits/ inspections provide no evidence of likely acid sulphate soil exposure (e.g. odour, discoloration, vegetation loss). ²	- Soil & engineering report where necessary prior to conducting excavations, with a view to identifying potential acid sulphate soils. - Adherence to Pipeline Excavation Procedure (TECH-PR-013) in relation to acid sulphate soil management.	ST02
2.4 To identify and manage pre-existing site contamination.	Records demonstrate no HSE incidents in relation to pre-existing site contamination.	Administrative controls in place (refer Incident & Hazard Management Procedure (OHSE-PR-004)) to manage identified site contamination.	ST02
2.5 To identify activities off the easement which may result in soil instability and to jointly manage potential risks in consultation with stakeholders.	- Records of audits/inspections demonstrate that surface contours along the easement are consistent with adjoining land. ² - Records show that alteration of surface contours (e.g. – berms and contour banks to manage erosion) are initiated in consultation with stakeholders.	- Regular liaison with stakeholders (landholders, land users, mining applicants, utilities, Shire Councils). - Where required, compliance auditing of easement and photo point monitoring to validate compliance.	ST02



SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026

Doc Ref: OHSE-MAN-001

This is a Controlled Document

Review Date: July 2031

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
Objective 3: To maintain soil stability along the easement (Construction, commissioning, operations, maintenance and decommissioning)			
3.1 To effectively manage soil compaction.	Records of site audits/ inspections provide no visual evidence of soil compaction (e.g. hard soil, local water pooling or poor re-establishment of vegetation) along the easement. ^{1,2}	• Ripping of identified compaction. • Where required, compliance auditing of easement and photo point monitoring to validate compliance.	ST03

3.2 Water resources (surface and groundwater)

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
Objective 4: To minimise and manage impacts to water resources. (Construction, commissioning, operations, maintenance and decommissioning)			
4.1 To restrict sediment discharge which enters surface water.	- Records of audits/inspections (including turbidity measurements where relevant) demonstrate no deterioration of surface water quality resulting from construction activities when compared with adjacent areas. ^{1,2} - Records demonstrate no reasonable complaints received in relation to increased sediment load and turbidity in water courses. - Records of audits / inspections demonstrate compliance with SA - EPA Environment Protection (Water Quality) Policy 2015. ^{1,2}	- Administrative management guidelines detailed in project specific CSEMP to include: - No stockpiling of materials in watercourses/drainage lines - Use of appropriate sediment and silt control devices - Installation of permanent berms on slopes - Minimising period between clearing and reinstatement at or near watercourses - Stabilisation, reinstatement and revegetation of watercourses and drainage lines. - Induction of construction workforce in relation to SEO and CSEMP compliance expectations. - Acquisition of all necessary approvals and permits for water affecting activity through relevant Landscape Board or EPA licensing for dredging if required. - Where required, compliance auditing of ROW. - Where required, photo point monitoring to validate compliance.	WR01
4.2 To minimise short term and prevent long term interruption or modification to surface drainage patterns during construction.	- Records of audits/inspections demonstrate no adverse impacts (e.g. downstream ecology or land use) resulting from watercourse flow reductions or diversions as a result of construction activities. ^{1,2} - Records of audits/inspections demonstrate no evidence of altered watercourse flows following ROW reinstatement. ^{1,2} - Records of inspections/audits demonstrate no evidence of project related erosion of	- Avoidance of surface water features as far as is practicable. - Identification of sensitive areas and specific CSEMP requirements. - Compliance with CSEMP and SEO conditions, including landholder consultation. - Induction of construction workforce in relation to SEO and CSEMP compliance expectations. - Engineering controls through installation of temporary watercourse crossings and selection of appropriate construction techniques in consultation with catchment management stakeholders. - Acquisition of all necessary approvals for watercourse crossings prior to construction (e.g. water affecting activity permit through relevant Landscape Board or EPA licensing for dredging if required). - Where required, compliance auditing of ROW. - Where required, photo point monitoring to validate compliance.	WR02

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
	watercourses intersecting or adjacent to construction ROW. ¹ - Records of site audits/ inspections demonstrate surface drainage profiles are restored to pre-construction conditions or better. - No new water affecting activities as defined under the Landscape South Australia Act undertaken unless applicable permits have been obtained.		
4.3 To maintain current surface drainage patterns during operation	- Records of audits/inspections demonstrate drainage along the easement is maintained to pre-existing conditions or better. ^{1, 2} - Records of audits/inspections demonstrate surface drainage profiles are restored following maintenance activities. ²	- Environmental inspections looking for evidence of erosion, abnormal vegetation growth or vegetation loss. - Scheduled ground and aerial patrols of the easement in conjunction with additional patrols following significant weather events. - Scheduled landholder liaison in accordance with SEA Gas Third Party Contact and Consultation Procedure (OHSE-PR-032). - Installation and monitoring of photo points to validate compliance following maintenance activities.	WR02
4.4 To minimise disruption to third party use of surface waters.	Records demonstrate no reasonable complaints received from stakeholders in relation to surface water impacts.	- Administrative (procedural & consultation with stakeholders) controls to manage potential disruptions. - Minimise disturbance and expeditious reinstatement along sections of ROW which intersect or are adjacent to water bodies. - Engineering controls through installation of temporary watercourse crossings.	WR02
4.5 To adequately manage groundwater	Records of audits/ inspections demonstrate no evidence of project related groundwater impacts arising from construction activities. ¹	- Administrative and engineering controls implemented to manage: - Avoidance of damage to groundwater infrastructure - Potential for alteration of groundwater flows (e.g. ensuring adequate trench compaction and use of trench plugs)	WR03



SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026

Doc Ref: OHSE-MAN-001

This is a Controlled Document

Review Date: July 2031

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
	Records demonstrate no reasonable complaints received from groundwater users as a result of pipeline construction and operation.	- Construction constraints imposed by shallow groundwater - Protection of groundwater from acid sulphate soils. - Where required, compliance auditing of ROW.	

3.3 Flora and fauna

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
Objective 5: To minimise adverse impacts to flora and fauna (Construction and commissioning)			
5.1 To minimise clearing or trimming of remnant native flora and avoid unapproved clearing or trimming.	- Ecological assessment undertaken by appropriately trained and experienced personnel to determine baseline biodiversity along the pipeline, and to identify and avoid any areas of sensitivity or 'no-go' areas. - Records (e.g. ecological assessments, audits / inspections) demonstrate that remnant vegetation is avoided where practicable and trimming of native flora minimised. ¹ - Records demonstrate that necessary approvals under the Native Vegetation Act have been obtained and SEB obligation has been satisfied where clearance is required.	- Elimination, by utilising where practicable previously disturbed areas. - CSEMP, Environmental Line List (ELL) and alignment sheets identify remnant vegetation requiring management/avoidance. - Administrative controls to flag/mark areas of remnant and significant vegetation under the Environment Protection and Biodiversity Conservation Act (Cwth) 1999 (EPBC Act). - Where practicable, retention of living and dead trees (habitat) along the ROW. - Approved trimming of vegetation to be conducted by qualified operators in lieu of removal where practicable (Refer Native Vegetation Clearance Procedure (OHSE-PR-005)). - Disturbance along the ROW to be restricted to approved access and work areas. - Where practicable, reduction of ROW width during construction in identified environmentally significant areas. - Administrative control of vegetation clearance activities, ensuring that applicable permits or clearance consents are obtained as required prior to commencement. - Where practicable, provenance seed and plant species to be sourced for rehabilitation, prior to commencing vegetation clearance.	FF01
5.2 To appropriately rehabilitate the ROW to as near as reasonably practicable to pre-construction conditions while maintaining line of sight between the marker posts along the easement.	Records demonstrate that species biodiversity along the ROW is as far as reasonably practicable, consistent with pre-construction conditions. (Note: An assessment of consistency with surrounding areas will take into account that regrowth is a	- Revegetation with appropriate local provenance native species of areas along the easement where remnant vegetation has been cleared during construction. - Post construction restoration of pasture and broad acre areas along the ROW in consultation with landholders. - Where required, compliance auditing of ROW. - Where required, photo point monitoring to validate compliance.	FF01

	time and rainfall dependent process). Records demonstrate no reasonable complaints received from landholders in relation to vegetation regrowth along the ROW.		
5.3 To achieve a Significant Environmental Benefit (SEB) for native vegetation clearance.	- Records demonstrate that vegetation offsets are fulfilled in consultation with stakeholders: - SEB is approved by the South Australian Native Vegetation Council.	Where clearance of native vegetation cannot be avoided Significant Environmental Benefit to be implemented in consultation with stakeholders.	FF01
5.4 To minimise disturbance and potential for entrapment of fauna and livestock	- Ecological assessment undertaken by appropriately trained and experienced personnel to determine baseline biodiversity along the pipeline, and to identify and avoid any areas of sensitivity or 'no-go' areas. - Records (e.g. audits / inspections / incident reports) show that native fauna and livestock attrition due to construction activities is As Low As Reasonably Practicable (ALARP).¹	- Identification and flagging of significant fauna habitats that require management or avoidance during construction. - Elimination of significant areas through optimum alignment selection which minimises or avoids impacts to nesting or breeding habitats (e.g. – South-eastern Red-tailed Black-Cockatoo). - Exclusion of livestock from operational areas along the ROW. - Provision of ramps at regular intervals in trench lines and excavations to mitigate against entrapment of fauna or livestock. - Daily inspection of open trenches and excavations for trapped fauna and livestock.	FF02 FF03 FF04
Objective 6: To minimise adverse impacts to flora and fauna (Operations, maintenance and decommissioning)			
6.1 To restrict clearing of native vegetation during the course of operational activities to	Records of audits / inspections show that approved trimming of native vegetation is restricted to the minimum necessary to	- Vegetation is trimmed to ensure line of sight between pipeline marker posts in accordance with AS2885 requirements in accordance with Vegetation Clearance Procedure (OHSE-PR-005). - Vegetation trimming minimises impacts to flora and fauna.	FF05

sites which were offset during construction or for which approval has been obtained.	ensure line of sight between pipeline marker posts.² Records demonstrate that vegetation management within the easement or on adjacent land to the easement is limited to previously disturbed areas unless appropriate approval has been obtained.²		
6.2 To promote and maintain regrowth of native vegetation along the easement, consistent with the surrounding area, ensuring that line of sight between pipeline marker posts is maintained.	- Records of audits / inspections demonstrate that species abundance and vegetative cover along the easement to be as near as practicable to adjoining areas in accordance with site specific management criteria. (Note: Assessment of consistency with surrounding areas will take into account that regrowth is a time and rainfall dependent process).² - No reasonable complaints received from landholders or third-party users in relation to adverse impacts to vegetation, native fauna or livestock.	- Regular inspections of the easement to validate revegetation works. - Liaison with landholders and land users to validate re-vegetation of broad acre areas following maintenance activities. - Elimination of operational impacts by restricting maintenance activities to designated facilities, access tracks and public thoroughfares unless stakeholders have been consulted. - Note: Prior to conducting vegetation trimming along the easement stakeholders must be consulted (Refer Native Vegetation Clearance Procedure (OHSE-PR-005)).	FF05
6.3 To ensure that maintenance activities are planned and conducted in a manner that minimises impacts on vegetation, native fauna and livestock.	Records (e.g. audits, inspections, incident reports) demonstrate that native fauna, flora and livestock impacts associated with maintenance activities are reduced to ALARP. ²	- Pre-start environmental assessment for excavations in areas of significant flora or fauna (as identified in the Environmental Line List (OHSE-PR-018)). - Management plan implemented for significant (EPBC listed) fauna and flora species (i.e. South-eastern Red-tailed Black-Cockatoo). - Exclusion of livestock from active maintenance areas along the easement in consultation with landholders.	FF06



SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026

Doc Ref: OHSE-MAN-001

This is a Controlled Document

Review Date: July 2031

		• Provision of ramps at regular intervals in open trenches and other excavations to mitigate against entrapment of fauna or livestock • Daily inspection of open trenches and excavations for trapped fauna and livestock. • Prompt reinstatement and revegetation of cleared vegetation. • Where required, auditing of easement and photo point monitoring to validate compliance.	
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3.4 Cultural and historical heritage (aboriginal and non-aboriginal)

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
Objective 7: To minimise and manage impacts to heritage and culturally sensitive sites and values during construction activities. (Construction and commissioning)			
7.1 To minimise disturbance of heritage (archaeological and built) and culturally sensitive sites and vegetation in accordance with the provisions of the relevant acts.	- Records of audits/site inspections demonstrate no impact to identified heritage sites without prior approval in accordance with applicable legislative requirements:¹ - Aboriginal Heritage Act (SA) 1988 (AH Act) - Heritage Place Act (SA) 1993 (HP Act). - All newly identified sites reported to the appropriate authority, consistent with any applicable Native Title Agreement, the AH Act and the Coroners Act 2003.	- Identification of known heritage sites along the ROW (including search of relevant registers/databases) - Consultation with relevant parties (including government agencies and/or relevant Aboriginal cultural heritage groups) where appropriate. - Avoidance of cultural heritage sites as far as practicable - Pre-construction site surveys and cultural heritage monitoring during clear and grade operations within sensitive areas. - Implementing management protocols for accidental discovery of cultural heritage material (refer Cultural Heritage Management Procedure (OHSE-PR-019)) - Acquisition of all necessary approvals permits and authorisations prior to construction. - Records demonstrate that site works cease upon the discovery of Aboriginal or non-Aboriginal Heritage. - All necessary approvals /notifications actioned in the event of accidental discovery of cultural material.	CH01
Objective 8: To adequately protect heritage and culturally sensitive sites and values during operational activities (Operations, maintenance and decommissioning)			
8.1 To ensure that identified heritage (archaeological and built) and culturally sensitive sites and vegetation are not disturbed and where new sites are identified, they are appropriately managed.	- No impact to known sites without prior approval in accordance with applicable legislative requirements including Aboriginal Heritage Act (SA) 1998 and Heritage Places Act (SA) 1993. - Newly identified sites are reported to the appropriate authority and recorded.	- Consultation with relevant heritage groups in the event that access is required in other than existing surveyed areas. - Site surveys and cultural heritage monitoring (where required) before and during excavations in other than existing surveyed areas. - Review of site-specific consideration (e.g. Environmental Line List (OHSE-PR-018) before excavations in existing surveyed areas. - Implementation of cultural heritage management protocols (Refer Cultural Heritage Management procedure (OHSE-PR-019)) in the event of accidental discovery of cultural heritage material during operational activities.	CH02



SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026

Doc Ref: OHSE-MAN-001

This is a Controlled Document

Review Date: July 2031

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
		• All necessary approvals /notifications actioned in the event of accidental discovery of cultural material. • Incident reporting • Records of audits demonstrate that site works cease upon the discovery of Aboriginal or non-Aboriginal Heritage.	

3.5 Noise & vibration

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
Objective 9: To minimise construction noise (Construction and commissioning)			
9.1 To minimise noise impacts associated with the movement and operation of construction vehicles and equipment.	• ROW activities must comply with the relevant EPA noise policies and guidelines unless prior consultation and agreement with stakeholders have occurred. • No reasonable noise complaints received in relation to noise abatement issues are left unresolved.	• Construction noise near residences must comply with EPA noise policies and guidelines. • Consultation with local residents/landholders/land users when unavoidable out-of-hours or short duration excessive noise will be generated. • Engineering controls to be applied to vehicles, plant and equipment in order to comply with noise abatement requirements.	NV01
9.2 To minimise noise impacts associated with pipeline or facility commissioning activities.	• ROW activities must comply with the relevant EPA noise policies and guidelines unless prior consultation and agreement with stakeholders have occurred. • No reasonable noise complaints received in relation to noise abatement issues are left unresolved.	• Commissioning activities near residences or sensitive land use areas to comply with EPA (SA/Vic) noise policies guidelines. • Consultation with local residents/landholders/land users when short duration excessive noise will be generated. • Where required, compliance auditing of ROW	NV01
Objective 10: To minimise noise impacts due to routine operational activities (Operations and maintenance)			
10.1 To ensure that routine operational activities comply with noise abatement standards.	• Records (e.g. noise measurements during commissioning / operation of facilities) demonstrate routine operational activities in the near vicinity of sensitive areas (e.g. - near residences) comply with the relevant EPA noise policies and guidelines.	• Noise assessment undertaken for new above-ground facilities located near residences to ensure compliance of operational noise with the Environment Protection (Commercial and Industrial Noise) Policy 2023. • Operational activities near residences or sensitive land use areas to comply with EPA noise policies and guidelines. • Consultation with local residents/landholders/land users when short duration excessive noise will be generated. • Where required, compliance auditing of ROW.	NV02

	Records demonstrate that all reasonable complaints received in relation to noise abatement issues are resolved.	- Consultation with stakeholders when planned unavoidable out-of-hours or short duration excessive noise will be generated. - Incident reporting	
Objective 11: Minimise noise impacts on amenity (decommissioning)			
11.1 To minimise disturbance to landholder and third party stakeholders during decommissioning activities.	- Records demonstrate no reasonable noise complaints received from residents are left unresolved. - Records demonstrate that landholder activities not materially restricted or compromised as a result of decommissioning activities, unless by prior arrangement. - Records of audits/inspections demonstrate that noise from decommissioning is appropriately managed.	- Activities are undertaken in accordance with approved decommissioning and rehabilitation plans. - Records of communications with landholders and affected third parties prior to, during and following decommissioning activities. - Landholder activities not materially restricted as a result of decommissioning activities.	NV03

3.6 Air Quality & GHG

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
Objective 12: To minimise atmospheric emissions (Construction and commissioning)			
12.1 To minimise the generation of dust.	Records demonstrate no reasonable complaints received in relation to fugitive dust emissions.	- Site specific dust impacts managed by use of water trucks and sprayers. - Construction workforce inducted/trained regarding SEO and CSEMP requirements - Compliance auditing undertaken at agreed frequency and where practicable associated actions implemented. - Incidents and complaints are investigated and where practicable associated corrective actions implemented	AQ01
12.2 To minimise impacts of gas venting activities.	- Records demonstrate no reasonable complaints received in relation to gas venting activities. - Records demonstrate gas venting events have been documented.	- Greenhouse emissions hierarchy of control applied in accordance with SEA Gas Climate Change Sustainability Standard (OHSE-SST-001) to minimise gas emissions (avoid, reduce, offset). - Gas venting activities to include consultation with stakeholders. - Emissions tracking for greenhouse gas abatement and reporting purposes.	AQ03
12.3 To minimise impacts of emissions generation from vehicles and equipment.	Records demonstrate no reasonable complaints received in relation to vehicle and equipment emissions.	- Greenhouse emissions hierarchy of control applied in accordance with SEA Gas Climate Change Sustainability Standard (OHSE-SST-001) to minimise gas emissions (avoid, reduce, offset). - Gas venting activities to include consultation with stakeholders. - Emissions tracking for greenhouse gas abatement and reporting purposes.	AQ03
Objective 13: To minimise atmospheric emissions (Operations, maintenance and decommissioning)			
13.1 To minimise the generation of dust.	Records demonstrate no reasonable complaints received in relation to dust management.	- Safe operating procedures to be applied in relation to site specific dust management requirements (i.e. fugitive dust and use of water trucks and sprayers) - Where required, compliance auditing to be undertaken as detailed in the Audit and Assurance procedure.	AQ02
13.2 To minimise impacts of emissions generation from vehicles and equipment.	Records demonstrate no reasonable complaints received in relation to vehicle and equipment emissions.	- Maintenance procedures are implemented. - EPA licence requirements for compressor station operations are complied with. - Incident Reporting	AQ04



SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026

Doc Ref: OHSE-MAN-001

This is a Controlled Document

Review Date: July 2031

13.3 To eliminate uncontrolled atmospheric emissions and minimise impacts of gas venting activities.	- Records demonstrate no reasonable complaints received in relation to planned gas emissions. - Gas venting events are documented.	- Maintenance procedures are implemented - Greenhouse gas hierarchy of control applied in accordance with SEA Gas Climate Change Sustainability Standard (OHSE-SST-001) to minimise gas emissions (avoid, reduce, offset) - Planned gas venting activities to include consultation with stakeholders. - Emissions tracking for greenhouse gas abatement and reporting purposes.	AQ05
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3.7 Public health and safety

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
Objective 14: To minimise the risk to public health and safety (Construction and commissioning)			
14.1 To adequately protect public safety during construction activities by managing hazards.	Records show no injuries or incidents involving the public that could have been reasonably prevented by the operator.	- Construction hazards identified via Job Hazard Analysis & Permit to Work system. - Consultation with affected stakeholders prior to and during construction and commissioning activities. - Administrative and engineering controls to be applied (e.g. – traffic management plans, traffic control, signage, isolations, detours, road infrastructure repair / reinstatement requirements, notifications and permits with the relevant road authority) along the ROW to isolate the construction workforce and public from hazards. - Induction of construction workforce and site visitors in relation to CSEMP compliance expectations. - Project specific Emergency Response Plan to be implemented and exercised. - Where required, compliance auditing of ROW.	HS01
14.2 To mitigate risk of fire during construction activities	Records demonstrate no construction or commissioning related fires.	- Elimination of ‘Hot Work’ during declared fire bans unless relevant fire authority permits are in place. - Management of construction fire hazards, via Job Hazard Analysis & Permit to Work system (refer also Fire Prevention Procedure (OHSE-PR-011)). - Personal protective equipment applied during construction and commissioning activities. - Liaison with Country Fire Service (SA) and Country Fire Authority (Vic). - Induction of construction workforce and site visitors in relation to emergency management procedures. - Where required, compliance auditing of ROW.	HS02
Objective 15: To minimise the risk to public health and safety (Operations and maintenance)			
15.1 To adequately protect public safety.	Records demonstrate no records of injuries or incidents involving members of the public that could have been reasonably prevented by the operator.	- Compliance with Job Safety Analysis and Safe Work Method Statement Procedure (TECH-PR-003) & Permit to Work Procedure (TECH-PR-004). - Records of communications with landholders and third parties prior to and during planned maintenance activities. - Use of signage and/or isolating methods to identify/exclude unauthorised personnel from hazardous areas.	HS03

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
	- Records demonstrate no pipeline loss of containment in an area not designed for a gas escape. - Records demonstrate no reduction in pipeline MAOP due to pipeline integrity. - Records demonstrate no immediate repair necessary to maintain safe pipeline operation.	- Traffic management provisions, plans and practices, road infrastructure repair/reinstatement requirements, and notifications and permits with the relevant road authority. - Records of Remaining Life Review, Fitness for Purpose Reports; Risk Assessments; site inspections and audits; Quarterly Reports; Key Performance Indicators. - Records demonstrating compliance with AS2885. - Emergency Response Plan in place. - Incident reporting	
15.2 To prevent unauthorised activity along the easement that may adversely impact on pipeline or facility integrity	Records demonstrate no unauthorised activity on the easement that has the potential to impact on pipeline integrity.	- Inspection/Patrol activities (aerial and ground). - Comprehensive landholder liaison program and landholder database detailing communications. - Maintain clear identification of pipeline by marker signage in accordance with AS2885. - All reports of unauthorised activity are reported and investigated.	HS03
15.3 To actively educate landholders, land users and emergency service in respect to pipeline safety and emergency procedures.	Records demonstrate no unauthorised activity on the easement that has the potential to impact on pipeline integrity.	- Community education program and Free call 'Before You Dig Australia', asset referral service number widely advertised. - Records of liaison and provision of pipeline awareness information to Emergency Services.	HS03
15.4 To minimise the impact on public health and safety in the event of a pipeline incident or emergency.	- Records show that emergency response procedures are effectively implemented in the event of an emergency, as assessed by post-incident debrief. - Records show that emergency response exercises are conducted, reported on and actions arising are addressed.	- Emergency Response Plan in place. - Crisis Management Plan in place. - A minimum of two Emergency Response Exercises conducted each year. - Pipeline venting facilities are located away from residential areas. - The risk of noise impacts from pipeline venting is reduced to as low as reasonably practicable by reducing inventory through customer draw down (where safe and practicable), community notification, stakeholder consultation and where necessary promoting evacuation. - Where change of land use increases the risk to public health and safety due to noise impacts from pipeline venting, additional controls are identified through further assessment and implemented by the responsible party to ensure the risk remains ALARP	HS03

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
15.5 To avoid fires associated with pipeline maintenance activities.	- Records demonstrate that no fires have occurred as a consequence of maintenance activities. - Records demonstrate facility vegetation management, inspections and audits are undertaken.	- Records detailing fire safety and emergency preparedness for operations and maintenance personnel. - Compliance with Job Safety Analysis and Safe Work Method Statement Procedure (TECH-PR-003) & Permit to Work Procedure (TECH-PR-004). - Appropriate fire prevention/control equipment and measures in place during operations and maintenance activities. - Records detailing relevant fire authority permits in relation to Hot Work during fire ban days (Refer Fire Prevention procedure (OHSE-PR-011)). - Incident reporting. - Scheduled weed maintenance conducted at facilities	HS04
Objective 16: To appropriately decommission the pipeline in accordance with regulatory requirements and accepted best practice environmental management.			
16.1 To safely decommission the pipeline and associated above ground infrastructure in accordance with appropriate regulatory requirements	Pipeline and associated above-ground infrastructure decommissioned to an appropriate standard that addresses the environmental objectives for operations and construction, as appropriate and as required by the legislative requirements of the day.	- Approved decommissioning plan - Approved rehabilitation plan - Records of consultation with appropriate regulatory authorities, industry associations and landholders. - No above-ground infrastructure is evident. - Where required, auditing to validate compliance.	HS05

3.8 Security of gas supply

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
Objective 17: To maintain security of gas supply (Operations and maintenance)			
17.1 To have systems in place to assess the ongoing fitness-for-purpose of infrastructure and management systems to ensure the security of supply	- Records demonstrate no unplanned interruption to gas supply that impacts the public. - Records demonstrate no reduction in pipeline MAOP due to pipeline integrity. - Records demonstrate compliance with Energy Resources Act (SA) 2000 Requirements for Fitness-for-purpose assessments.	- Pipeline Integrity Management Plan in place. - Records of Remaining Life Review, Fitness for Purpose Reports; Change Management; site inspections and audits; Quarterly Reports; Key Performance Indicators. - Records demonstrating compliance with AS2885 including Safety Management Study reviews, as per Regulation 29 of the Petroleum and Geothermal Energy Regulations (SA) 2013.	SS01 SS02
17.2 To minimise the impact on the community of a pipeline incident or emergency resulting in gas supply loss or curtailment.	- Emergency response procedures are effectively implemented in the event of an emergency, as assessed by the post-incident debrief. - Records demonstrate emergency response exercises are conducted, reported on and actions arising are addressed. - Any ministerial direction in relation to gas supply is followed. - Records demonstrate that material incidents that impact gas supply or have the potential to impact gas supply are investigated.	- Emergency Response Plan in place. - Crisis Management plan in place. - A minimum of two Emergency Response Exercises conducted each year. - Compliance with any ministerial direction in relation to gas supply. - Incident reports and investigations.	SS01 SS02

17.3 To restore gas supply as soon as is practicable.	Records demonstrate that pipeline repaired in a timeframe that represents good industry practice.	Appropriate repair strategies in place based on identified pipeline risks.	SS01 SS02
17.4 To appropriately reinstate and rehabilitate any damage that may result from a pipeline incident or emergency, such that it is as near as practicable to prior to disturbance and allows stakeholder usage to continue.	Records demonstrate that damage arising from a pipeline incident or emergency is remediated to as near as practicable to conditions prior to disturbance, such that stakeholder usage can continue.	- Site rehabilitation plan developed in consultation with stakeholders. - Site rehabilitation plan implemented and auditing and photo point monitoring to validate compliance.	SS01 SS02

3.9 Waste management

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
Objective 18: To avoid land or water contamination (Construction and commissioning)			
18.1 To ensure that construction waste is disposed of in an appropriate manner.	- Records of audits/inspections demonstrate no rubbish on ROW. ¹ - Records of audits/inspections demonstrate that waste material is contained and disposed of in accordance with the Environment Protection Act. ¹ - Records of audits/inspections show that waste at construction camps is stored and disposed of in an approved manner. ¹	- Waste management requirements including removal of all waste is specified in the CSEMP. - Compliance with Abrasive Blasting & Painting Procedure (OHSE-PR-022) in relation to waste management. - Compliance auditing of ROW to validate rubbish removal, no spills, no soil discoloration or odour, no third party complaints. - Waste disposal records, chemical manifests maintained. - Appropriately licensed contractors used for any hazardous waste disposal and records maintained for all hazardous waste disposal.	WM01
18.2 To prevent adverse impacts as a result of hydrostatic test water, trench water, vehicle and equipment wash down.	- Records of audits/inspections show no evidence of impacts to soil, water and vegetation as a result of water disposal (e.g. soil erosion, soil salinity, dead vegetation, water discoloration) as a result of construction activities. ¹ - Records show that discharge water complies with SA EPA Environment Protection (Water Quality) 2015 criteria.	- Water discharge conducted in a manner that prevents discharge or runoff to watercourses or environmentally sensitive areas. - Where practical water is recycled or discharged in a manner that does not result in erosion. - CSEMP to detail hydrostatic test water disposal management requirements. - Water quality testing to be conducted prior to in-situ release of waste water (including pre-excavation dewatering). - Containment and treatment of waste water on-site or removal off-site for appropriate treatment/disposal where water quality is unsuitable in-situ release. - Inspection of in-situ sites for evidence of unauthorised off-site, watercourse or environmentally sensitive area contamination. - Contaminated soil surveys to identify location, nature and extent of any pre-existing contamination that may influence waste water disposal. - Compliance with Washdown Procedure (OHSE-PR-008) - Where required, compliance auditing of ROW and construction camps.	WM01
18.3 To ensure the safe and appropriate disposal	Records of audits/inspections demonstrate no evidence of	Containment and disposal of camp waste water in an approved manner (e.g. – Council or commercial waste treatment facility).	WM01

of camp wastewater (e.g., grey water and sewage).	impacts to soil, water and vegetation as a result of waste water containment or disposal (e.g. soil erosion, soil salinity, dead vegetation, water discolouration). ¹ Records of audits show that discharge water complies with the requirements of South Australian Public Health (Wastewater) Regulations 2013 and On-site Wastewater Systems Code 2013. ¹	- On site treatment of camp wastewater to appropriate water quality standards prior to discharge (e.g. – grey water and effluent) in a manner that prevents entry into water bodies or water courses. - Compliance with the relevant local Government regulations and sanitation regulations. - Treated sewage wastewater disposed onto land, well away from any place from which it is reasonably likely to enter any waters. - Where required, compliance auditing of ROW and construction camps.	
Objective 19: To avoid land or water contamination. (Operations, maintenance and decommissioning)			
19.1 To ensure that rubbish and waste material are disposed of in an appropriate manner.	- Records of audits/ inspections show no waste on easement, at other than designated storage areas within facilities, pending disposal. ² - Records demonstrate waste is disposed of in accordance with approved protocols (Environment Protection Act).	- Waste management requirements met including removal of all maintenance related waste. - Regular inspections of easement and construction areas to validate compliance (waste removed from easement, no spills, no soil discoloration or odour, no third party complaints). - Appropriately licensed contractors used and records maintained (e.g. – waste tracking certification, chemical manifests) maintained for all hazardous waste disposal.	WM02
19.2 To prevent adverse impacts as a result of trench water, vehicle and equipment wash down and effluent disposal.	- Records demonstrate that wastewater meets relevant ANZECC / ANZG water quality guidelines criteria at the point of discharge and is disposed onto land, well away from any place from which its reasonably likely to enter any waters. - Records of audits/ inspections demonstrate no evidence of impacts to soil, water and vegetation as a result of water	- Liquid waste is disposed in a manner which prevents discharge or runoff to watercourses or environmentally sensitive areas. - Water discharged on stable ground, with no evidence of erosion as a result of discharge. - Records maintained in relation to disposal/discharge method and location and any third party consultation. - Testing of salinity and/or water quality prior to release/disposal of trench water (including pre-excavation dewatering) and waste water. - Containment and treatment on-site or removal off-site for appropriate treatment/disposal where water quality is unsuitable for on-site disposal. - Inspection of water disposal sites for evidence of water entering a watercourse or environmentally sensitive area.	WM02

	disposal (e.g. soil erosion, soil salinity, vegetation loss, water discolouration, impacts to aquatic fauna) as a result of operation and maintenance activities. ²		
19.3 To ensure the safe and appropriate disposal of facility wastewater (e.g., grey water and sewage).	- Records of audits show that wastewater complies with the requirements of South Australian Public Health (Wastewater) Regulations 2013 and On-site Wastewater Systems Code 2013. - Records of audits/inspections demonstrate no evidence of impacts to soil, water and vegetation as a result of wastewater discharge (e.g. soil erosion, soil salinity, dead vegetation, water discolouration)²	- Waste water disposal systems comply with legislative requirements. - Treated sewage wastewater disposed onto land, well away from any place from which it is reasonably likely to enter any waters. - Where required, facility and maintenance audits to validate compliance.	WM02

3.10 Hazardous Storage, Spill and Emergency response

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
Objective 20: To avoid land or water contamination. (Construction, commissioning, operations, maintenance and decommissioning)			
20.1 To prevent the occurrence of spills during construction and to have in place a spill management strategy.	- Records of audits/ inspections demonstrate no spills or leaks outside areas designed to contain them (e.g. bunded areas, or fenced facilities with respect to minor spills) that result in land or water contamination. ^{1,2} - Records show that the EPA is notified of any contamination in accordance with Section 83 and 83A of the Environment Protection Act 1993. - Any uncontained spills with larger scale impact are assessed and remediated (where required) using a risk-based approach, consistent with the principles of the National Environment Protection (Assessment of Site Contamination) Measure 1999 and in accordance with the South Australian Guidelines for Assessment and Remediation of Site Contamination (November 2019), where appropriate. - Records (e.g. audits/inspections) demonstrate no spread of existing soil contamination as a result of pipeline construction activities. ^{1,2}	- Where required, compliance auditing of ROW to assess soil or water discoloration and vegetation or fauna loss. - Compliance with AS 1940-2017 - The storage and handling of flammable and combustible liquids. - Spills managed in accordance with Spill Response Procedure (OHSE-PR-009): - Containment and reporting - Clean-up and site restoration - Root cause investigated and corrective/preventative actions are implemented; and - Monitoring initiated where necessary. - Engineering and administrative controls applied within environmentally sensitive areas along ROW. - Management of spill response/cleanup capability including: - Spill response training - Guidelines for containment of all hazardous substances and liquid waste in appropriate vessels and bunded areas - Compliance with fuel and hazardous waste standards (storage and use) - Use of drip trays, spill mats or bunded areas for refuelling of vehicles and plant.	HER01

20.2 To prevent spills occurring during operation and decommissioning, and should they occur, to minimise their impact.	• No spills or leaks outside areas designed to contain them (e.g. bunded areas, or fenced facilities with respect to minor spills) that result in land or water contamination. • Records demonstrate that the EPA is notified of any contamination in accordance with Section 83 and 83A of the Environment Protection Act 1993. • Records demonstrate that all minor spills within facilities reported, cleaned up and remediated as soon as is practicable. • Any uncontained spills with larger scale impact are assessed and remediated (where required) using a risk-based approach, consistent with the principles of the National Environment Protection Measure 1999 and in accordance with the South Australian Guidelines for Assessment and Remediation of Site Contamination (November 2019), where appropriate.	• Where required, regular inspections for evidence of soil or water discolouration, vegetation or fauna death. • A spill contingency response plan to address fuels, lubricants and chemicals (refer Spill Response Procedure (OHSE-PR-009)). Chemicals to be stored in accordance with EPA guidelines. • Use of spill protection methods within or adjacent to environmentally sensitive areas. • Spill response/clean-up procedures, to ensure: ○ Reporting ○ Containment ○ Clean-up and restoration ○ Cause investigated and corrective and/or preventative action implemented. • Ensuring that personnel are trained in spill response procedures. • Containment of all hazardous substances and liquid waste in appropriate vessels and containment areas. • Compliance with fuel and hazardous waste standards.	HER01
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3.11 Weeds, pests and pathogens

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
Objective 21: To avoid the introduction or spread of weeds, pests and pathogens (Construction and commissioning)			
21.1 To avoid the introduction or spread of environmental or proclaimed weeds, pests or animal/plant pathogens, by undertaking appropriate site-specific control measures where required.	- Records of audits / inspections demonstrate that the presence of weeds, pests and pathogens along the ROW is consistent with or better than pre-disturbance/ construction conditions and adjacent land. ¹ - Records of audits / inspections demonstrate no new outbreaks or spread of weeds, pests or pathogens in the construction area. ¹ - Records demonstrate no reasonable complaints received from landholders in relation to new outbreaks or spread of weeds, pests or pathogens during pipeline construction.	- Environmental assessment during the planning stage to identify the presence of weeds, pests and or pathogens and appropriate management measures. - Minimise spread of weeds, pests and pathogens along ROW, through pre-identification and implementation of management strategies prior to and during construction. - Vehicle and plant to minimise weed and pathogen spread (refer Washdown Procedure (OHSE-PR-008)) through inspection and washdown prior to entry into/departure from affected areas. - Where required, compliance auditing of ROW. - Where required, photo point monitoring to validate compliance.	WPP01
Objective 22: To prevent the introduction and spread of weeds, pests and pathogens (Operations, maintenance and decommissioning)			
22.1 To ensure that weeds, pests or animal and plant pathogens are managed in a manner that is consistent with the surrounding land parcels.	- Records of audits / inspections demonstrate presence of weeds, pests and pathogens on the easement is consistent with or better than that of adjoining land parcels. ² - Records of audits / inspections demonstrate no new outbreaks or spread of weeds, pests or	- Maintenance activities include identification of weeds on the easement and triggering of management measures following identification. - Implementation of appropriate management measures for the control of weeds, pests and pathogens on the easement during maintenance activities (e.g. – cathodic protection and coating surveys, excavation, pigging). - Photo point monitoring at significant outbreak sites.	WPP02

	pathogens in areas undergoing maintenance.² Records demonstrate no reasonable complaints received from landholders in relation to new outbreaks or spread of weeds, pests or pathogens during pipeline operation and maintenance activities.		
22.2 To ensure that vehicle and equipment washdown is conducted where appropriate along the easement.	- Records of audits / inspections demonstrate presence of weeds, pests and pathogens on the easement is consistent with or better than that of adjoining land parcels.² - Records of audits / inspections demonstrate no new outbreaks or spread of weeds, pests or pathogens in areas undergoing maintenance.² - Records demonstrate no reasonable complaints received from landholders in relation to new outbreaks or spread of weeds, pests or pathogens during pipeline operation and maintenance activities.	- Vehicles and machinery to be washed down and inspected prior to entry/departure from affected areas (Refer Environmental Line List (OHSE-PR-018)). - Vehicle and machinery wash down register to be maintained (Refer Vehicle Equipment Washdown Procedure (OHSE-PR-008)). - Where required, compliance auditing of easement.	WPP02

3.12 Third party infrastructure, landholders and land use (including visual amenity and socio economic)

Environmental Objective and Goal	Assessment Criteria	Leading Performance Criteria	Control Measures – EIR Impact ID
Objective 23: To minimise disturbance to third party infrastructure, land holders and land use (Construction and commissioning)			
23.1 To minimise disturbance or damage to infrastructure or land use and to remediate where disturbance cannot be avoided.	- Records demonstrate that where disturbance is unavoidable or accidental, infrastructure or land use is restored to as near as practicable to the satisfaction of the stakeholder. ¹ - Records of audits/ inspections demonstrate no disturbance outside the ROW or approved access and work areas. ¹ - Records of audits / inspections demonstrate that the duration of disturbance does not exceed agreed timeframe, without prior consultation with stakeholders. ¹	- Easement agreements outlining legal responsibilities of SEA Gas and landholders. - Compliance with CSEMP to restrict disturbance along the ROW to approved access and work areas. - Stakeholder consultation prior to and during construction/commissioning activities. - Measures implemented to minimise visual impact where practicable.	LTP01
23.2 To minimise disturbance to landholders or land users.	- Records of audits / inspections show that pre-existing land use not restricted or impeded as a result of construction or commissioning activities unless by prior arrangement. ¹ - Records demonstrate no reasonable complaints received in relation to asset disturbance or reinstatement during construction.	- Site access in accordance with stakeholder consultation plan prior to and during construction/commissioning activities. - Sites requiring management of hazards or restricted access to be detailed on the Environmental Line List. - Where required, photo point monitoring to validate compliance.	LTP01
23.3 To appropriately identify and locate	Records demonstrate no unauthorised disturbance of	The location of surface and underground telecommunication, water, wastewater and irrigation infrastructure to be identified during the survey of the proposed gas pipeline route.	LTP03

buried third-party infrastructure prior to commencing any excavation activities.	third-party utilities or infrastructure. Records demonstrate no reasonable complaints received in relation to unauthorised disturbance of third-party utilities or infrastructure.	- Records of communications with landholders and third parties prior to and during construction / commissioning activities. - Construction workforce inducted / trained regarding CSEMP requirements. - Incident reporting.	
23.4 To appropriately reinstate and rehabilitate the easement to as near as practicable, pre-construction conditions, to allow continuation of current land use activities post-construction.	- Records of audits/ inspections show that vegetation along the ROW and at construction areas to be as near as practicable to adjoining areas in agreement with stakeholders. (Note: Assessment of consistency with surrounding areas will take into account that regrowth is a time and rainfall dependent process).¹ - Records of audits / inspections show that land has been rehabilitated, recontoured and revegetated, consistent with pre-existing conditions or agreements with stakeholders.¹	- Site specific rehabilitation in consultation with stakeholders. - ROW to be rehabilitated with appropriate pasture, cover crops or plantings in consultation with stakeholders. - Induction of construction workforce in relation to CSEMP compliance expectations. - Where required, compliance auditing of ROW. - Where required, photo point monitoring to validate compliance.	LTP05
Objective 24: To minimise disturbance to third party infrastructure, land holders and land use (Operations and maintenance)			
24.1 To minimise disturbance or damage to infrastructure or land use and to remediate where disturbance cannot be avoided	- Records demonstrate that where disturbance is unavoidable or accidental, infrastructure or land use is restored to as near as practicable to the satisfaction of the landholder/owner. - Records of audits / inspections demonstrate no disturbance	- Operational activities restricted to pipeline easement and approved access and work areas - Records of communications with landholders and third parties during maintenance activities. - Landholder contact database and liaison program maintained. - Measures implemented to minimise visual impact where practicable. - Incident reporting.	LTP02

	outside the easement or approved access and work areas without prior consultation.² - Records demonstrate that the duration of disturbance does not exceed agreed timeframe without prior consultation. - Records demonstrate no reasonable complaints received in relation to disturbance.		
24.2 To minimise disturbance to stakeholders	- Records of audits / inspections demonstrate that pre-existing land use not restricted or impeded as a result of maintenance activities unless by prior arrangement.² - Records demonstrate no reasonable complaints received in relation to disturbance.	- Communications with landholders and third parties prior to and during maintenance activities that have the potential to disturb stakeholders. - Any impact on landholder activities, as a consequence of maintenance, to be minimised, where practicable.	LTP02
24.3 To appropriately identify and locate third party infrastructure prior to commencing any excavation activities in the course of operational or maintenance activities.	- Records demonstrate no impact or unauthorised disturbance to third-party utilities or infrastructure. - Records demonstrate no reasonable complaints received in relation to unauthorised disturbance of third-party utilities or infrastructure.	- Use of Before You Dig Australia asset referral system. - Identification of third party utilities and infrastructure on alignment sheets and SEA Gas Geographical Information System (GIS). - Records of communications with landholders and third parties prior to and during maintenance activities which may impact third party infrastructure (e.g. excavation). - Incident reporting.	LTP04
24.4 To appropriately reinstate and rehabilitate the easement, such that it	Records of audits/ inspections show that vegetative cover along the easement to be as near as practicable to adjoining areas, or	- Site / property specific rehabilitation requirements specified in an agreement with landholders. - Re-seeding of the easement with appropriate pasture or cover crops in consultation with landholders.	LTP06

is as near as practicable to conditions prior to disturbance and allows stakeholder usage to continue	as agreed with landholders. (Note: Assessment of consistency with surrounding areas will take into account that regrowth is a time and rainfall dependent process). ² Records of audits / inspections show that land has been rehabilitated, recontoured and revegetated, consistent with pre-existing conditions or agreements with stakeholders. ²	- Records of communications with landholders and third parties prior to and during maintenance activities. - Where required, auditing of easement and photo point monitoring to validate compliance.	
Objective 25: To appropriately decommission the pipeline in accordance with regulatory requirements and accepted best practice environmental management.			
25.1 To minimise disturbance to landholders and third-party stakeholders during decommissioning activities.	- Records demonstrate no reasonable landholder complaints arising from decommissioning activities. - Records of audits/ inspections demonstrate that land holder activities are not materially restricted or compromised as a result of decommissioning activities, unless by a prior arrangement. ²	- Approved decommissioning plan - Approved rehabilitation plan - Records of communications with landholders and affected third parties prior to, during and following decommissioning activities. - Landholder activities not materially restricted as a result of decommissioning activities. - Where required, auditing to validate compliance.	LTP07

	SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	Doc Ref: OHSE-MAN-001
This is a Controlled Document		Review Date: July 2031

4 Measurement and Evaluation

Performance against SEA Gas environmental objectives is measured principally through auditing and assurance processes, a review of the output of the environmental monitoring summarised in section 4.1 and by review of reported incident, near miss and hazards.

Each environmental objective has defined 'Assessment Criteria' and 'Leading Performance Criteria', which assist operators in determining compliance requirements and enables an assessment of compliance to be made.

An annual assessment of compliance is completed and reported to DEM through the annual pipeline license report.

4.1 Environmental Monitoring

SEA Gas environmental monitoring systems include:

- ROW patrols – aerial and road patrols;
- Landowner liaison;
- Permit to Work and contractor field assurance; and
- Specific monitoring at locations which have higher environmental risk or significance (Photo Points).

4.2 Environmental Audits

4.2.1 Internal Audits

SEA Gas conducts an audit to assess general compliance with the Statement of Environmental Objectives (OHSE-MAN-001) every five years, with the next audit due in 2027. SEA Gas will also conduct project based audits to assess compliance with the applicable environmental objectives, as appropriate.

4.2.2 External Audits

Internal audits may be supplemented or replaced by external audits by the regulator or experts to assess the effectiveness of the Environmental Management Systems.

External audits may also be used to gain assurance that performance meets and will continue to meet the requirements of standards, legislation and environmental policies.

	SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	Doc Ref: OHSE-MAN-001
This is a Controlled Document		Review Date: July 2031

5 **Reporting**

In accordance with *Section 100(1) (c) (ii)* of the *Energy Resources Act (SA) 2000* (the Act), an SEO for regulated activities must set out immediately reportable *incidents* and *reportable incidents* within the meaning of *Section 85(3)* of the Act and *Section 32 (1)* of the *Energy Resources Regulations (SA) 2013*.

5.1 **Incident Reporting**

The required content of incident reports is provided in detail in *Section 32* of the *Energy Resources Regulations (SA) 2013*.

Immediately Reportable Incidents must be reported to the Minister within 24 hours after the licensee becomes aware of the occurrence and a comprehensive report must be provided within 3 months, as per *Section 85* of the *Energy Resources Act (SA) 2000* and *Section 32* of the *Energy Resources Regulations (SA) 2013*.

Reportable Incidents must be reported by the licensee to the Minister on a quarterly basis within one month of the end of the quarter, as per *Section 85* of the *Energy Resources Act (SA) 2000* and *Section 32* of the *Energy Resources Regulations (SA) 2013*.

Section 32 (1) of the *Energy Resources Regulations (SA) 2013* defines a reportable incident as

- An escape of a regulated substance, a processed substance, a chemical or a fuel that affects an area that has not been specifically designed to contain such an escape; or
- An incident identified as a reportable incident under the relevant statement of environmental objectives

The following sections provide definitions applicable to SEA Gas.

5.1.1 **Immediately Reportable Incidents**

Immediately Reportable Incident means an incident arising from activities conducted under the licence and as detailed in Table 1:

	SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	Doc Ref: OHSE-MAN-001
This is a Controlled Document		Review Date: July 2031

Table 1: Immediately Reportable Incident Definitions for Operation (Facility and Pipelines) Activities

Immediately Reportable Incidents
1. A person is seriously injured⁴ or killed. 2. An imminent risk to public health or safety arises. 3. Serious environmental damage occurs or an imminent risk of serious environmental damage arises. i.e : a) Disturbance to sites of cultural and/or heritage significance without appropriate permits and approvals⁵. b) An escape of petroleum, process substance, a chemical, a fuel or other potential contaminants to a water body, or to land in a place where it is reasonably likely to enter a water body by seepage or infiltration, or onto land that affects the health of native flora and fauna species. c) Detection of a declared weed, animal/plant pathogen or plant pest species that has been introduced or spread as a direct result of activities. d) Any removal of rare, vulnerable or endangered flora and fauna without appropriate permits and approvals⁶. 4. Security of natural gas supply is prejudiced or an imminent risk of prejudice to security of natural gas supply arises⁷. 5. An event that results in a rupture of a pressure containing asset of facility. 6. A regulated activity⁸ being undertaken in manner that involved or will involve a serious risk to the health or safety of a person emanating from an immediate or imminent exposure to a hazard⁹. 7. Activity on a pipeline easement where the pipeline is contacted and repair action is required¹⁰. 8. An uncontrolled gas release resulting in the activation of emergency response and/or evacuation procedures of an area in or adjacent to the gas release, and/or fire or explosion.

5.1.2 Reportable Incidents

Reportable incident means an incident (other than an immediately reportable incident) arising from activities conducted under a licence as detailed in Table 2.

⁴ As per the definition in Section 36 of the Work Health and Safety Act 2012.

⁵ Pursuant to Aboriginal Heritage Act 1988 and Heritage Places Act 1993

⁶ Pursuant to Native Vegetation Act 1991 (flora) and National Parks and Wildlife Act 1972 (fauna).

⁷ That is, after taking into account relevant factors on a day and rights and obligations under contracts, a significant curtailment of firm service that detrimentally impacts or is likely to impact upon the security of electricity supply to South Australia or to gas supplies to a significant number of commercial and/or domestic gas users in SA.

⁸ Regulated activity as defined in Section 10 of the Energy Resources Act 2000.

⁹ Resulting in the issuing of a prohibition notice by SafeWork SA pursuant to Section 195 the Work Health and Safety Act 2012.

¹⁰ For the case where a detailed assessment is required to determine this, DEM recommends the incident be reported initially and amended at a later date if required.

	SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	Doc Ref: OHSE-MAN-001
This is a Controlled Document	Review Date: July 2031	

Table 2: Reportable Incident Definitions for Operation (Facility and Pipelines) Activities

Reportable Incidents
1. An escape of petroleum¹¹, processed substance, a chemical, a fuel or other potential contaminant that affects an area that has not been specifically designed to contain such an escape¹² (other than an immediately reportable incident). 2. An event that has the potential to compromise the physical integrity of an asset or facility. For example: a) Activity on a pipeline easement with equipment that has been identified as exceeding the pipeline's penetration resistance, determined in accordance with Australian Standard (AS) 2885. b) Identification of a through-wall defect on a pipeline¹³ or plant component (other than an immediately reportable incident). c) Identification¹⁴ of a partial through-wall defect (e.g. through visual inspection, inline inspection, non-destructive testing) that requires repair or replacement action, or a reduction of the Maximum Allowable Operating Pressure, to maintain safe operation (other than a serious incident). d) Activity on a pipeline easement with equipment or vehicles that have been identified as exceeding allowable stress limits, determined in accordance with AS2885. e) An unapproved¹⁵ excursion outside of critical design or operating conditions/parameters. f) Failure of a critical procedural control in place to reduce a credible threat to low or as low as reasonably practicable (ALARP).¹⁶ 3. Unauthorised activity on a pipeline easement where the pipeline is contacted but repair action is not required. 4. Malfunction or failure of critical plant or equipment that had (or still has) potential to cause a serious incident. 5. Any event where an incursion outside a culturally cleared area has occurred or the conditions of a cultural heritage clearance have not been complied with (other than an immediately reportable incident).

¹¹ In gaseous, liquid or solid state, as per *Energy Resources Act 2000* definition.

¹² An area assigned during a Hazard and Operability Process (HAZOP) study as a hazardous area for the purpose of gas venting, and designed as such, is considered to be an area specifically designed to contain a gas escape. Bunded areas or fenced facilities with respect to minor spills are considered to be an area designed to contain a liquid escape.

¹³ As per *Energy Resources Act 2000* definition, the term 'pipeline' includes tanks, machinery and equipment necessary for, or associated with, operation of the pipeline

¹⁴ For reporting purposes, the incident is considered to have occurred at the time that a decision is made to repair or replace the defect, or reduce the Maximum Allowable Operating Pressure.

¹⁵ Approval" as per AS2885 definition. Note that there may be situations where excursions are allowable under AS2885.

¹⁶ As per the Safety Management System process articulated in AS 2885.6-2018, or similar risk assessment process.

	SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	Doc Ref: OHSE-MAN-001
This is a Controlled Document	Review Date: July 2031	

5.1.3 Other Reporting Requirements

5.1.3.1 Reporting to the EPA

Where applicable, incidents causing or threatening serious or material environmental harm under the *Environment Protection Act 1993* (EP Act) must be reported to the South Australian Environment Protection Authority (EPA) in accordance with section 83 or 83A of the EP Act.

5.1.3.2 Reporting to SafeWork SA

Notifiable incidents (i.e. death, serious injury or illness, or dangerous incidents) must be reported to SafeWork SA in accordance with Part 3 of the *Work Health and Safety Act 2012*.

5.1.3.3 Reporting to Attorney General's Department – Aboriginal Affairs and Reconciliation

Notification of a discovery of Aboriginal site, object or remains must be reported to the Minister for Aboriginal Affairs in accordance with Section 20 of the *Heritage Act 1988* (Note: Any discovery of potential human remains must also be immediately reported to SAPOL, as required by the *Coroner's Act 2003*).

5.1.3.4 Reporting to the Regional Landscape Board

Notification of presence of Category 1, 2 or 3 animals or plants in prescribed areas, in accordance with the *Landscape South Australia Act 2019*. The regional landscape board for the area in which the land is situated must be notified within the prescribed period of the presence of a Category 1, 2 or 3 animal or plant on that land.

	SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	Doc Ref: OHSE-MAN-001
This is a Controlled Document		Review Date: July 2031

6 Definitions

Approval	Refers to an approval under the relevant legislation.
Activity	Any operation (as defined under <i>Part 3</i> of the <i>Energy Resources Act (SA) 2000</i>) necessary or incidental, for conduct of a regulated activity governed by the <i>Energy Resources Act (SA) 2000</i> . Such operations include the construction and operation of facilities and pipelines and the undertaking of geophysical surveys.
Consequence	The outcome of a particular event. For example, a consequence of a spill event which contaminates soil could be a reduction in soil fertility and hence agricultural value of the land affected by the activity. Note: A consequence in this context also includes an outcome of a chain of events.
Consistent with Surrounding Land/Area	A qualitative assessment of land condition on the easement to determine if the condition of the easement is similar to that of the adjacent/adjoining land in terms of soil, vegetative, landform, hydrological or other aspects.
Construction Activities	Any activity associated with the construction of a pipeline or associated facilities, including detailed survey, fencing, clear and grade, trenching, stringing of pipe, bending, welding, 'jeeping', radiographic testing, joint coating, padding, lowering-in, backfilling, pressure testing, restoration and rehabilitation, installation of signage, inspection and testing, construction of pressure regulation and metering facilities and installation of cathodic protection systems and installations.
Easement	A parcel of land above a buried pipeline (typically 10 - 25 metres in width) or upon which above ground facilities are constructed, which is accessible by SEA Gas to undertake licensed activities (e.g. - construction, maintenance or repair activities) and where specific conditions may apply in accordance with the <i>Grant of Easement</i> as negotiated between SEA Gas and the landholder.
Environment	Is broadly defined (in the Act) to include its natural, social, cultural and economic aspects.
Event	A normal or an atypical incident which occurs in a particular place at a particular time as a result of an activity which could result in adverse environmental consequence(s) to the natural, social or economic environments.
Infrastructure	Physical assets which are built on the land (e.g. – roads, power poles, fences, railway, tanks, dams and other services).
Landholder	Owner, occupier or user of the land.
Land use	Use of land (e.g. – cropping, grazing, access, industrial, residential, environmentally sensitive, recreational).
Line of Sight Clearance	Clearing or removal of vegetation between pipeline marker signage along the easement in order to maintain a clear line of sight between each preceding and subsequent pipeline marker (e.g. – removal of trees along the easement where large trees cannot be retained; vegetation trimmed to a height of 0.5m over the pipeline and to 3m either side of centerline (to ensure that operational obligations that mandate pipeline integrity and personnel safety

	SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	Doc Ref: OHSE-MAN-001
This is a Controlled Document		Review Date: July 2031

are not compromised) for the purpose of risk management in accordance with AS2885, whereby by any SEO objective is subservient to this requirement.

<i>Minimise</i>	To reduce as far as practicable, considering all other factors (e.g. – requirements for safe operations and accessibility).
<i>Operational Activities</i>	Any activity associated with the operation, inspection and maintenance of the pipeline, easement and associated facilities, including dig-ups, pigging and integrity testing, welding, cathodic protection, inspection and testing, pipeline surveys (including marine and Direct Current Voltage Gradient surveys), patrol activities (foot, vehicle and aerial), vegetation management, erosion and subsidence control, facility maintenance (Main Line Valves, compressor stations, access tracks, Cathodic Protection beds, metering and pressure reduction facilities, storage and use of chemicals, weed control, waste treatment and disposal and inspection and testing).
<i>Petroleum</i>	Refers to a naturally occurring substance consisting of hydrocarbon or a mixture of hydrocarbons in gaseous, liquid or solid state.
<i>Regulated Activity</i>	Regulated activities (in the context of transmission pipeline operations) include construction of a transmission pipeline for carrying petroleum or another regulated substance or operation of a transmission pipeline for carrying petroleum or another regulated substance.
<i>Right-of-Way (ROW)</i>	A section of land, which may include public roads, negotiated between SEA Gas and a third party whereby access is granted through or over the land: • for the purposes of accessing the pipeline easement; or • to an area greater than that detailed in the <i>Grant of Easement</i>, to conduct licensed activities (e.g. – construction, excavation, equipment storage).
<i>Spill</i>	Uncontrolled or unplanned release or discharge of a hydrocarbon, chemical or hazardous substance.
<i>Timely Manner</i>	A timeframe agreeable with the licensee and an impacted third party, that considers all external factors (e.g. – weather constraints, suitable planting opportunity, accessibility, safe operating conditions).
<i>Transmission Pipeline</i>	A pipeline for conveying petroleum or another regulated substance from a point at or near the place of its production to another place or other places, or a pipeline that forms part of a system of pipelines for that purpose.

	SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	Doc Ref: OHSE-MAN-001
This is a Controlled Document		Review Date: July 2031

7 Glossary

APGA	Australian Pipeline and Gas Association
AS2885	Australian Standard AS 2885: Pipelines – Gas and Liquid Petroleum
CSEMP	Construction Safety and Environmental Management Plan
DEM	Department for Energy and Mining
EIR	Environmental Impact Report
EPA	Environment Protection Authority (SA)
EPBC	Environment Protection and Biodiversity Conservation Act (Comm.) 1999
PL	Pipeline Licence
SEB	Significant Environmental Benefit
SEO	Statement of Environmental Objectives
HSE	Health, Safety and Environment

	SEA Gas PL 13 Port Campbell to Adelaide pipeline, Statement of Environmental Objectives, July 2026	Doc Ref: OHSE-MAN-001
This is a Controlled Document		Review Date: July 2031

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